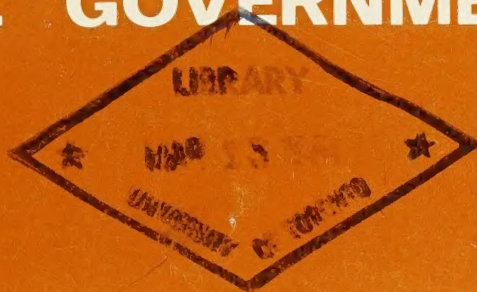


CA20NTR
74B61

GOVERNMENT
PUBLICATIONS

BRANT AREA LOCAL GOVERNMENT REVIEW



Report of the Commission



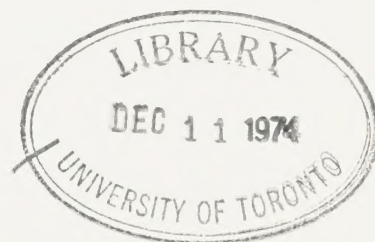
*Ont. Ministry of Treasury, Economics and
Intergovernmental affairs.
[General publications]
[G-28]*

CA24NTR
-74B61


BRANT AREA LOCAL GOVERNMENT REVIEW

REPORT OF FINDINGS and RECOMMENDATIONS

HOWARD S. SMITH, M.T.P.I.C.
Commissioner



JANUARY 1974



Digitized by the Internet Archive
in 2022 with funding from
University of Toronto

<https://archive.org/details/31761115462194>

BRANT AREA LOCAL GOVERNMENT REVIEW

HOWARD S. SMITH, COMMISSIONER
BRIAN TURNBULL, RESEARCH DIRECTOR

Telephone (519) 759-8918
35 WEBER STREET EAST
KITCHENER, ONTARIO

January 10, 1974.

To the Honourable John H. White,
Treasurer of Ontario.

Sir:

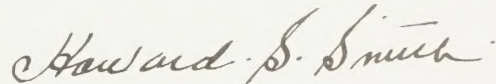
I am pleased to submit herewith the Report of the
Brant Area Local Government Review Commission.

The Report was compiled on the basis of an extensive research programme conducted by both the Commission and many of those making submissions and after a careful consideration of both written and oral submissions made during several weeks of public hearings.

In the interests of brevity and readability, this Report does not contain large numbers of the tables and background material which forms the basis for many of the recommendations contained. Summaries of this material were published during the conduct of the study. A copy of each of the sixteen Resource Material Bulletins containing this background information is also forwarded herewith.

I trust that this Report will be of assistance to you and your colleagues as well as to the people and the municipalities in the Brant Area, as a basis for discussion of changes in local government structure and responsibility to better serve the present and future population of the Brant Area.

Respectfully submitted,



HSS:PK

Howard S. Smith, M.T.P.I.C.,
Commissioner,
Brant Area Local Government Review.

Enclosure

TERMS OF REFERENCE OF THE COMMISSION
BRANT AREA LOCAL GOVERNMENT REVIEW

The Terms of Reference for your study will be as follows:

- (1) The Brant Area shall include, primarily, the municipalities of the County of Brant and the City of Brantford.
- (2) The Commissioner will examine the following aspects of local government in the Brant Area and report his findings and recommendations:
 - (a) structure;
 - (b) organization;
 - (c) financing;
 - (d) inter-municipal relations and problems concerning two or more municipalities and/or boards and commissions;
 - (e) the future development of the Brant Area or other changes that may affect local government;
 - (f) any other related matter affecting the Brant Area, particularly the relevance of the outer boundaries of the area to be studied.

ACKNOWLEDGEMENTS

The Commission cannot hope to acknowledge the many individuals, groups, and organizations who have made valuable contributions to this Study but the Commission would be remiss if it did not mention the assistance received by the Brant Joint Liaison Committee, and the Brant Area municipalities and their staffs. The Commission is deeply appreciative of their assistance and co-operation in all ways and of their many kindnesses to the Commission.

The Commission would also like to recognize the valuable contributions made - particularly during the research period - of Mr. Brian Turnbull, Brian Turnbull and Associates, Mr. Ian MacNaughton, MacNaughton Planning Consultants Ltd., and Mr. F. William Lehman of Dryden and Smith Planning Consultants.

To those many others who have not been specifically mentioned, the Commission expresses its deep appreciation and its hope for their continued attention and effort to the vital concerns of local government structure and function in the Brant Area.

RESOURCE MATERIAL BULLETINS

During the conduct of the study, the Commission prepared and distributed in excess of four thousand copies of some sixteen Resource Material Bulletins. These Bulletins consisted of summaries of the major areas of research undertaken.

Since this material received such broad distribution throughout the area, it is not the intent of the Commission to reprint or regurgitate this material in the Report of the Commission. Throughout the Report reference is made to the various Bulletins and it is assumed that copies of this material will be available to and read with this Report.

The following Bulletins were published:

- | | |
|---|---|
| 1. General Programme Outline | 9. Inspection Services |
| 2. Comparative Analysis
Regional Government Legislation in Ontario | 10. Social Services |
| 3. Preliminary List of Matters for Consideration | 11. Health Services |
| 4. Existing Municipal Operations | 12. Solid Waste Collection and Disposal |
| 5. Joint Boards and Commissions | 13. Education |
| 6. Fire Services | 14. Hospitals |
| 7. Police Protection | 15. Planning |
| 8. Roads System | 16. Additional Resource Material |

SUMMARY OF PRINCIPAL RECOMMENDATIONS

THIS SUMMARY CONTAINS THE PRINCIPAL RECOMMENDATIONS ONLY. MANY ADDITIONAL RECOMMENDATIONS ARE CONTAINED IN THE REPORT ITSELF.

The Commission Recommends:

1. A restructuring of local government in the Brant Area to provide a two tier government structure in the form of a restructured County of Brant to include four local municipalities of Brantford, Paris, East Brant and West Brant.

2. That the head of each of the four local municipalities would become, automatically, members of the County Council.

3. That election to County Council be on a ward basis and that County Councillors with the exception of the head of Council should not serve on the local municipal Council.

4. That County Council members be directly elected on a ward basis in accordance with the following:

City of Brantford

10 representatives from 5 wards

Town of Paris

2 representatives from 2 wards

East Brant

2 representatives from 2 wards

West Brant

3 representatives from 3 wards

In addition to the foregoing, the Head of each local municipality shall be a member of County Council, making a total of 21 County Council members.

5. That the first Warden in the restructured County be appointed by the Province to serve a three year term, and that this appointment be made at least four months, and preferably six months, prior to the actual effective date for the beginning of the operation of the new County structure.

6. That future Wardens would be elected by the County Council from among its own members in the historic pattern.

7. That members elected to County Council be elected for a three year term of office and it is also recommended that a three year term also apply in the restructured local municipalities as recommended in this Report.

8. Four local municipalities are proposed within the reorganized County of Brant. Two are urban - Brantford and Paris, and two are rural - East Brant and West Brant.
9. That the area of both the Town of Paris and the City of Brantford be considerably enlarged so that these two urban municipalities can accommodate the urban growth anticipated for a period of at least twenty years.
10. That the new municipality referred to as East Brant would consist of all of the former Township of South Dumfries (except for those areas included in the expanded Town of Paris) that portion of the former Township of Brantford lying east of the Grand River (except for those areas included in the expanded Town of Paris and City of Brantford) and the former Township of Onondaga.
11. That the new municipality referred to as West Brant would consist of the former Township of Burford and Oakland and that portion of the former Township of Brantford lying to the west of the Grand River (except for those areas included in the expanded Town of Paris and the City of Brantford).
12. That all Planning Boards and Planning Areas within the Brant Area be dissolved.
13. That a County Planning Committee made up of all members of County Council become responsible for all planning functions within the Brant Area, and that they appoint an adequate and qualified planning staff to work under the direction of the Planning Committee to provide the required technical assistance and input into the County Planning function.
14. That the Council of any local municipality may, if it desires, appoint the local Council as a Planning Committee to advise the County Planning Committee on matters of local concern, and local interest. When a local municipality does constitute the Council as a Planning Committee, the County Planning Committee shall refer to the local Committee all applications for amendments to the Official Plan, applications for amendments to the Zoning By-law, and subdivision applications for development proposals directly affecting that Municipality, for comment and recommendations.
15. That when an Official Policy Plan has been approved by the Minister, that the

Minister delegate to the County of Brant such of his powers as are being delegated to Regional Municipalities in Ontario.

16. That legislation be enacted to establish a County Land Division Committee and that the powers to grant land severances throughout all of the Brant County municipalities be vested in the Land Division Committee.
17. The establishment of a Brant County Police force to provide Police service to all residents of the Brant Area.
18. That the Brant County Police force be organized in two divisions. One division would provide the very sophisticated police service required, and now provided in the urban municipalities. The second division would be responsible for providing only that standard of service required by the rural municipalities.
19. That the taxpayer in the rural municipality pay only for the standard of service required and the residents of the urban municipality be assessed a higher rate for police protection to reflect the higher standard of service provided.
20. That a Provincial grant for police service equal to the grants provided for re-

gional police forces be provided to the Brant County Police Force.

21. That the responsibility for fire protection remains the responsibility of the local municipality.
22. The establishment of a core administrative unit and personnel at the county level to provide fire co-ordination, training, central purchasing, and maintenance of apparatus and equipment to carry out fire inspection and fire prevention services and administrative services for the Brant Area.
23. That in the establishment of such a county administrative core, the legislation clearly define the duties and responsibilities of both the core unit and the local municipal fire department.
24. That a network of major roads to serve the entire County (including the City of Brantford) should become the New Brant County Road System.
25. That the Brant County Suburban Roads Commission be abolished.
26. That legislation provide the County with the power to control land uses adjacent to the Brant County Road System and

- power to control future access to this system.
27. That when the expanded County Road organization is being formulated, consideration be given to having that organization provide engineering, construction and maintenance service upon request to the local municipalities on a contractual basis.
28. That the Provincial grants for the new Brant County Road System be provided on the same basis as grants have been provided for regional roads in a number of recently created Regional Municipalities.
29. That the provision of Health and Social Services be the responsibility of the proposed restructured County of Brant.
30. That the studies presently underway considering the possibility of much closer co-ordination of Health and Social Services continue and that serious consideration be given to associating these two inter-related services at the county level under one Director of Health and Social Services.
31. That the operation of the John Noble Home for the Aged becomes the responsibility of the County of Brant and that the Board of Governors consist of a six man committee of County Council.
32. That water supply and sewage disposal become the responsibility of the restructured County.
33. That water distribution and sewage collection remain the responsibility of the local municipality.
34. That the costs of water supply and sewage disposal facilities be assessed entirely against those taxpayers who directly benefit by receiving these services.
35. That the County be responsible for the operation of solid waste disposal site and the planning and acquisition of future sites.
36. That the local municipalities retain the responsibility for the collection of solid wastes and delivery to the disposal site.
37. That legislation provide that the restructured County of Brant be eligible for those additional provincial grants which are presently provided to Regional Municipalities pursuant to the provisions of the Regional Municipal Grants Act R.S.O. 1970 as amended.

38. That provision be made in enabling legislation for the provision of additional transitional grants to assist the Brant Area in the reorganization of municipalities, duties and functions, as recommended in this Report.
39. That all capital borrowing and the issue of debentures for the purposes of the County and/or any local municipality or municipalities within the County be the responsibility of the County of Brant.
40. The abolition of some of the existing joint boards and commissions, the transfer of responsibility in some areas directly to the restructured County.
41. That elected officials must be prepared to assume more direct responsibility for the operation and financial control of many of the services presently operated by appointed boards and commissions.
42. That the provision of park and recreation facilities remain the responsibility of the local municipality but this is not to suggest that the County of Brant should not enter into 'Schemes' with the Conservation Authority for the acquisition of major recreation and conservation areas to serve the residents of the entire Brant Area.
43. That the County of Brant is responsible for the provision of comprehensive inspection services for all Brant Area municipalities.
44. In order to further strengthen and consolidate the representation on the Conservation Authority from the Brant Area, the Commission recommends that the County of Brant assume responsibility of representing all Brant residents and municipalities on the Grand River Conservation Authority.

TABLE OF CONTENTS

Letter of Transmittal		i
Terms of Reference		ii
Acknowledgements		iii
Resource Material Bulletins		iv
Summary of Recommendations		v
Chapter 1	Introduction	1
	The Review Area	2
	The Need to Consider Change	3
Chapter 2	Structural Alternatives	5
	1. Retain the Present Municipal Structure	5
	2. Dissolve the County of Brant	6
	3. Creation of Local Government Structure Larger than Brant County	7
	4. Creation of a One Tier Local Government Structure	12
	5. Creation of a Two Tier Government Structure	15
Chapter 3	The Recommended Structure	16
	Representation on County Council	17
	County Warden	18
	Terms of Office	18
Chapter 4	Principles in Establishment of Local Municipal Units	21
	Principles of Local Municipal Limits	22
	Proposed Municipal Boundaries	
	City of Brantford	24
	Town of Paris	28
Chapter 5	Planning	32
	Land Severance and Committee of Adjustment	34

Chapter 6	Police Protection	36
	Fire Protection	38
Chapter 7	Roads	40
Chapter 8	Health, Social Services and Homes for the Ages	42
Chapter 9	Water Supply and Sewage Disposal	45
	Solid Waste Collection and Disposal	47
Chapter 10	Finance	50
	Assessment Base	50
	Grants and Subsidies	51
	Capital Borrowing	52
Chapter 11	Joint Boards and Commissions	53
	Parks and Recreation	54
	Inspection Services	54
	Conservation	55
	Six Nations	56

Chapter One

INTRODUCTION

The Terms of Reference provided to the Commission by the Honourable Darcy McKeough, then Treasurer of Ontario, on June 8, 1972, defined the Study Area in the following terms.

"The Brant Area shall include, primarily, the municipalities of the County of Brant and the City of Brantford". The Terms of Reference also included instruction to the Commission to examine amongst other matters "any other related matter affecting the Brant Area, particularly the relevance of the outer boundaries of the area to be studied".

In accepting these Terms of Reference, the Commission interpreted the phrase "particularly the relevance of the outer boundaries to be studied" to indicate that the Commission was free to carry the study programme and ultimately the Report of the Commission to consideration of areas well beyond the corporate limits of the County of Brant. At the time of public hearings, copies of all Resource Material Bulletins were forwarded to surrounding municipalities and abutting Counties. These municipalities were invited to make submissions to the Commission.

At the time the Commission was appointed, the only area abutting Brant which had undergone a local government reorganization was the Waterloo Region. Studies were underway

in the Hamilton-Wentworth area, the Haldimand-Norfolk area and in Oxford County but none of these studies had reached the point of decision or legislation.

Since that time a number of actions have tended to confine the Study Area to Brantford and Brant County. Legislation has been enacted to establish the Regional Municipality of Hamilton-Wentworth and the Regional Municipality of Haldimand-Norfolk. A recommendation is presently before the Minister concerning local government reorganization in the County of Oxford.

Although none of these developments necessarily preclude consideration of areas beyond Brant County, none the less, none of them appear to find a significant common interest with Brant sufficient to suggest that Brant forms a logical part in the reorganizations recommended for any of these surrounding areas.

Only in the case of Haldimand-Norfolk has there been even a veiled suggestion that Brant might now or at some time in the future, find a place in the reorganizations effected or proposed.

It is therefore the conclusion of the Commission that reorganization of local government structure in all areas surrounding Brant has advanced to the point that proposals for reorgani-

zation of local government affecting Brant - Brantford must be sought within the general outline of the present corporate limits of the County of Brant. No strong evidence can be found to indicate that the studies in the surrounding areas (all of which accept the basic County boundary as a proper limit for the reorganized municipality)

are at fault so far as the Brant area is concerned. The Commission therefore feels it must accept the definition in the Terms of Reference that "The Brant Area shall include, primarily, the municipalities of the County of Brant and the City of Brantford."

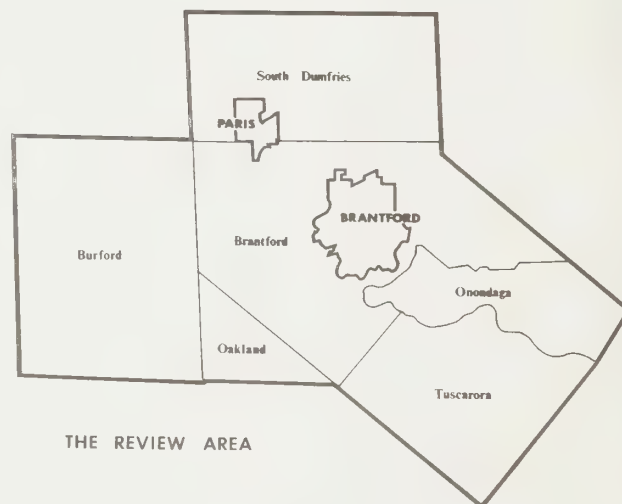
THE REVIEW AREA

The Review area as defined contains a total of 224,573 acres of land and the Brant - Haldimand - Norfolk Assessment office reports a total population of 90,266 and a total taxable assessment of \$202,551,734. as of September 1972.

Also included within the geographic limits of Brant County is the Tuscarora Indian Reserve and part of the New Credit Indian Reserve. The Reserve lands within the limits of the County contain approximately 43,872 acres of land and the population is estimated at approximately 5,000. The Indian Reserve lands do not, of course, form part of the Brant area for local government purposes.

The City of Brantford is said to contain

approximately 11,335 acres of land and a population of 62,107. The County of Brant contains approximately 213,238 acres of land and a total population of 28,159.



Brant County contains the following six municipalities:

<u>Municipality</u>	<u>Acreage</u>	<u>Population</u>
Town of Paris	1,976	6,411
Brantford Township	64,042	9,315
Burford Township	68,502	5,736
S. Dumfries Township	47,201	3,954
Oakland Township	10,910	1,380
Onondaga Township	20,607	1,363

THE NEED TO CONSIDER CHANGE

The need to review the present operations and functions of local government in Ontario has been amply illustrated – particularly during the past twenty years – by the increasingly difficult problems faced by all local municipalities in Ontario. Our present system of local government has served us well for over one hundred years but the rapidity of social and technological change over the past twenty years have clearly illustrated the need to strengthen local government organization to meet these changing needs.

All of the reasons for strengthening local government structure have been recited many times and the Commission does not propose to repeat them here. Suffice it to say that after examining these matters in the Brant Area, the

Commission is convinced that local government must either be sufficiently strengthened so that it can meet the challenge of to-day's society or alternatively be further weakened to the point where it becomes 'government' in name only.

That the people and the municipalities in the Brant Area recognize the need for change has also been clearly demonstrated not only in the submissions to this Review, but perhaps more clearly in the fact that the Review was commissioned in response to insistent demands from the Brant Area for such a study.

As might be expected, the submissions made proposed a number of alternative approaches to the matter of local government re-organization but no municipality proposed the retention of the status quo. All municipal briefs

recognized the need for reorganization and strengthening of local government in the Brant Area.

It is in light of this almost unanimous opinion of the people and the politicians in the

Brant Area that some form of local government reorganization is vital to the wellbeing and the continued growth and development of the Brant Area that this Report is made.

Chapter Two

STRUCTURAL ALTERNATIVES

The Commission was most fortunate in having presented to it briefs in support of what might be considered as each of the major alternatives for the restructuring of local government in the Brant area.

The County of Brant, supported by most of the constituent municipalities, presented a submission proposing the creation of a two tier Regional Municipality consisting of the Counties of Brant, Haldimand and Norfolk.

The Township of South Dumfries submission supported the creation of a two tier regional unit but restricted the size of the proposed region to the limits of the existing County of Brant.

The City of Brantford submission supported a one tier restructuring of local government in the Brant area.

This Report examines the following basic alternatives which appear to be available;

1. Retain the present municipal structure.
2. Consider the other extreme - to dissolve the County completely and annex all or parts of abutting Counties or Regions.
3. The creation of a local government structure larger than the present

Brant County (i.e. a Brant - Haldimand - Norfolk region or a Brant - Wentworth - Hamilton Region or a Brant - Oxford Region, etc.).

4. Create a one tier government in Brant-Brantford - with or without Ward Councils.
5. Create a two tier government structure in Brant-Brantford.

Although the foregoing may be considered to outline the principal alternatives available, the possible combinations and variations of the above general themes are almost endless. Without any attempt to discuss the myriad of possible variations, this report examines briefly the five main alternatives as outlined.

1. Retain the Present Municipal Structure:

This Study originated as an outcome of requests from the Municipalities in the Brant-Brantford region to the Provincial Government for such a Study. A review of the protracted discussions and consultation within and between Brant area municipalities over a period of years prior to this Study indicates an almost unanimous recognition of a long standing need to consider the adequacy of the existing local government structure.

The persistent requests - almost de-

mands - made on the Provincial Government for a study would indicate municipal recognition of the need for local government reform. The provincial decision to commission such a study would seem to indicate an appreciation at the provincial level of the need to consider possible local government reform in the Brant-Brantford area.

The exhaustive research undertaken by the Municipalities and the Commission during the study period, together with the numerous submissions made by the municipalities and others during the public hearings would all appear to support the view that some reform of local government structure and operations would better serve the present and future needs of the residents of the Brant-Brantford area.

Retention of the present municipal structure is therefore not recommended.

2. Dissolve the County completely and annex all or parts to abutting Counties or Regions.

Not surprisingly perhaps, this possible alternative for local government reorganization was not recommended or seriously discussed in any submission to the Commission. None the less, this possibility did receive some rather careful consideration during the preparation of the Commissioner's Report. A number of

factors led the Commission to consider this possibility including the following:

1. The suggestion made in Submissions and during public hearings that the Brant-Brantford area with a population only slightly in excess of 90,000 people could not 'on its own' constitute a strong local government unit.
2. The rather long narrow Onondaga Township lying between the Tuscarora Indian Reserve and the Wentworth County boundary seemed to suggest that this part of Brant County was more closely related - at least geographically - with Wentworth than it was with the rest of Brant.
3. There was suggestion in a number of briefs and oral submissions that many of the residents of the northern parts of South Dumfries Township had much closer communities of interest with Cambridge in the Waterloo Region than they had with the remainder of Brant County.
4. The Commission was impressed with the extent of common interest between Burford Township and the abutting Townships in Oxford County - particularly in the area of municipal drains. The Commission was informed that the soil conditions and topography in this area requires a very extensive and complex system of drains to maintain its agricultural economy. The Commission was also informed that the provision of this vital service to the residents of these municipalities was beyond question the major concern of local government in these areas.

If the purpose of local government is to provide those services required by the residents of the area under its jurisdiction, certainly such a major service requirement would suggest the desirability of one local government unit providing this service to the area requiring it.

5. During the Hearing, reference was made on a number of occasions to the very close ties there were between the residents of Oakland, Burford and Onondaga Townships to the north parts of Haldimand-Norfolk. The

opinion was expressed that these areas would experience little difficulty in an association with a re-organized local government structure in Haldimand-Norfolk.

6. The Tuscarora and New Credit Indian Reserves which form the south-east quadrant of Brant made no response to the Commission's invitation to express their wishes or concerns relative to possible reorganization of local government in the areas surrounding the Reserve lands. Since the Reserve does not participate directly in local government organization, the possibility of the inclusion of the Reserve within the physical boundaries of another County or Region would not appear to create major difficulties.

Having reviewed some of the arguments which might lead one to consider the dismemberment of Brant County, we are left with several concerns which, in the opinion of the Commission, far outweigh the possible arguments for dissolution of the County.

First, the arguments presented deal with the periphery of the County municipalities and provide no rationale for the disposition of the heart of the area - Brantford, Brantford Township, and Paris.

Secondly, and perhaps most important, is the Commission's belief - supported by many expressions by area residents - that effective and satisfactory local government structure must be based on a recognition of what is frequently referred to as Communities of Interest.

Great argument could be generated on the question of what constitutes a 'Community of Interest' of the type which would require or at least suggest a single local government structure. The Commission holds that one Community of Interest must fall, without dispute within this category - the common interest and loyalty recognized by all residents of the Brant Area to the Brant Area.

One of the concerns most frequently expressed during any discussion of local government reorganization is a fear of 'loss of identity'. During the Public Hearings the Commission had an opportunity on a number of occasions to discuss the meaning of 'identity' with those making submissions. Although these discussions lead the Commission to conclude that identity within the context of local government structure was an intangible almost defying clear definition, the definition difficulty did not in any way diminish its importance in the minds of almost all people. As local government structure and indeed our whole social structure becomes more complex, and as control and decision making appears to become more distant and impersonal, the need to retain a sense of security and 'belonging' seems to become a matter of urgent concern to the individual.

The dismembering of the Brant - Brantford area is not considered by the Commission to be a practical nor desirable form of local government reorganization.

3. The Creation of Local Government Structure larger than the present Brant County.

As mentioned in the introduction to this Report, at the time the Commission was appointed, there appeared to be a substantial number of possibilities for the creation of a unit of government for an area larger than Brant County. Indeed the main thrust of the submission of the County of Brant supported by the majority of constituent municipalities was that such a larger region encompassing Brant-Haldimand-Norfolk should be created.

Other possibilities were also available for consideration. A study by the County of Wentworth recommended the inclusion of Brant-Brantford with the Hamilton-Wentworth area to create a new region. This proposal appeared to find little support in the Brant-Brantford area and indeed there was little evidence in the Brant Area Study to support such a proposal. The main conclusion which might be drawn from the Wentworth County proposal appeared to be that Brant-Brantford should be included with Hamilton-Wentworth as a means of 'balancing' the potential influence of the City of Hamilton in the new region. No evidence was presented to the Commission to indicate that the City of Hamilton supported the proposal to include the Brant Area within the new Hamilton-Wentworth Region and the Provincial Government did not see fit to include the Brant Area in the legislation creating the new Region.

Although it remains a theoretical possibility that Brant could become part of the new Hamilton-Wentworth Region, there is little evidence to support such a proposal and this possibility is not recommended by the Commission.

A second possibility for the creation of a unit of local government larger than

Brant County would be the creation of a Brant-Oxford unit. Other than area of common concern in the matter of drainage previously referred to in Burford and the Townships in east Oxford, and certain shopping and work orientation from northwest Burford to the Oxford area, there is little evidence of that degree of common interests which would suggest the need or desirability of a single unit of government. The recently completed Oxford Study did not find reason to recommend a Brant - Oxford region and none of the submissions to the Brant Area Review proposed such a union.

The Commission is convinced that the creation of a Brant-Oxford unit of local government would not best serve the present or future residents of either area.

Although there was some evidence (not supported by the submission of the Township of South Dumfries) that a number of residents in the northerly part of this Township were strongly oriented toward the Waterloo Area, there appeared to be few other indicators of those types of community of interest between Waterloo and Brant that would suggest a reasonable basis for common local government structure.

The Commission does not find basis

for a Brant - Waterloo region.

This leaves consideration of the strongly supported submission that a Brant-Haldimand-Norfolk Region should be created. Because this position was so strongly supported, the Commission has examined this proposal most carefully with particular emphasis on the specific reasons set forth in the Briefs for this recommendation.

The County of Brant submission on Page 26 sets forth eleven paragraphs in support of their proposal under the general heading, "The main factors that have influenced the County of Brant in its choice of the most suitable region are summarized below:".

The Commission finds no argument with the statements made but on the other hand does not find the sum total of the reasons advanced as persuasive argument in favour of the creation of a single regional government encompassing the extensive area of Brant-Haldimand-Norfolk.

The Township of Brantford also presented a well rounded and comprehensive brief in support of the Brant - Haldimand - Norfolk region. Its similarity to the Brant County brief is pointed out at Page 78, in the following words:

"It should be noted however, that our scheme was and is essentially similar to that of the County of Brant, with which we have few disagreements; like the Brant proposal, it therefore differs widely from the other proposals."

At Page 70 the Brantford Township brief summarizes the reasons for the conclusion that Brant-Haldimand-Norfolk would constitute "The Most Suitable Region". As in the case of the Brant County brief, the Commission finds little disagreement with the seven statements included in this summary but also in common with the County brief, the Commission is not convinced that the reasons recited forms a sufficiently compelling argument to justify recommending a regional government structure encompassing these three Counties.

The submission of the Township of Onondaga provides a copy of a Resolution of the Township Council which "...supports in principle the proposal of the County of Brant in regard to local government re-organization for the Brant-Brantford area ...". The brief points out its 'close physical relationship with the County of Haldimand' and states a reservation on the proposal in the County brief relating to the splitting of the Township 'except after careful study'.

The submission of the Township of Oakland also indicates that the Council of that Municipality by resolution "...support the County of Brant's submission to the Commissioner of the Brant Area Local Government Review.". The brief lists a number of areas of close economic and social relationship of the County of Brant with the County of Norfolk including fire protection arrangements, common use of library, recreation and church facilities, and the marketing in Norfolk County municipalities of the Township's major crop - tobacco.

The Township of Burford's submission quotes the Council resolution which "supports the submission of the Council of the County of Brant in regard to local government reorganization as submitted to the Commission of the Brant Area Local Government Review.". The brief supports a two level regional system and the inclusion of the Township of Burford within a predominately rural lower tier municipality. This brief also expresses very strongly the opinion that Brant County would not be large enough on its own to meet the general criteria recommended for the establishment of a Region.

The Town of Paris states that the Corporation "is totally in agreement with

and supports fully the recommendations as set out in the brief submitted by the Corporation of the County of Brant".

The brief recites the present services provided by or for the Municipality and concludes with the following statement:

"In summary, it is evident that the Town of Paris has all the capabilities required to serve the people under the aforementioned two-tier system and the Town is willing to participate in such a system provided there is no loss of its identity or of the autonomy which it has under the present system".

In receiving these submissions, the Commission continually found itself concerned with two basic questions:

First, the Commission was continually haunted by the impression that the Brant-Haldimand-Norfolk proposal originated more with a feeling that the Brant area needed to be part of a much larger area to fulfil the oft' quoted population minimum deemed desirable for a Region and to be 'strong' enough to compete with other Regions than it did with any finding of a true rationale for the creation of a local government structure serving this large area.

Secondly, the Commission was concerned with the question of whether it was possible at this time to evaluate the implication of becoming associated with Haldimand-Norfolk - not as it is - but as it appears it will be.

In answer to the first question, the Commission after careful reading of submissions and consideration of the comments and oral submissions made during Public Hearings is forced to the conclusion that if it had not been for the minimum

population suggested as appropriate for a Region that there would have been much less support for the Brant - Haldimand - Norfolk proposal.

The Commission feels that this proposal was really presented as the most desirable method of creating a large enough population to "qualify" rather than the most desired form of local government reorganization.

Dealing with the second question, the Commission is impressed with the findings in the Haldimand-Norfolk Study relating to the unique situation in that area. Unquestionably the scale of development proposals both industrial and residential foreseen in this predominantly rural area will require unique approaches to solution.

The Commission is also aware of the recognition of this problem in the studies and recommendations of the Haldimand - Norfolk study. In the 'Summary of Threshold of Change 2: Local Government' the section headed "The Proposed Structure" at Page 6, begins with the following statement:

"Because of the tremendously rapid rate of growth expected for the area, no new local government structure is likely to be well suited both to the needs and conditions of the immediate future, and to those which will follow later on."

The scale and rapidity of the develop-

ments anticipated in the Haldimand - Norfolk area will, in the opinion of the Commission, require a Provincial input and influence much beyond that experienced in other areas. To carry out and control the anticipated development will not likely be within the capabilities of the recognized Haldimand-Norfolk region without massive injections of manpower expertise and money from the Provincial level. With provincial input must come provincial responsibility which implies provincial control. This situation must be viewed as necessary in light of the anticipated Haldimand-Norfolk developments but it might well prove uncomfortable and inappropriate applied to an orderly and stable Brant area.

The Commission is further concerned that the scale and the urgency of attention to the massive developments anticipated in the Haldimand-Norfolk area and the need to marshal all available resources both human and financial to deal with these developments might well work to the disadvantage of the Brant area if it formed part of this region.

Most important of all, the Commission does not find persuasive evidence that the residents of the Brant area could anticipate better or more reasonable local

government services as part of a Brant - Haldimand - Norfolk Region.

The Commission does not recommend the inclusion of the Brant area within a Brant - Haldimand - Norfolk Region at this time.

Having made the foregoing recommendation, the Commission draws attention to the qualifying clause included in its recommendation "at this time".

The Commission is firmly convinced that in this age of rapidly changing technology and changing social requirements that any form of local government reorganization devised at any point in time cannot be expected to remain static and permanent. The Commission foresees continuing change by evolution of the duties, responsibilities and structure of local government. The best that can be hoped is that the form of structure devised will best serve the foreseeable needs of the residents and will be so structured as to provide the flexibility that will be required to respond to the inevitable changing requirements.

The Haldimand-Norfolk study has perhaps gone farther toward recognition of this matter than any of the previous studies of local government reorganization. The Haldimand-Norfolk study not

only recognizes that the recommended structure may require adjustment in light of foreseen change but in fact bases the recommended structure on the explicit assumption that future review will take place. In "Summary of Threshold of Change 2: Local Government" and again referring to the section headed "The Proposed Structure" at Page 6, we find the following:

"It is therefore strongly recommended that a new review take place after perhaps ten years to determine what further changes may be needed, and the local government structure that is described below is recommended on the explicit assumption that this second review will be undertaken."

This Commission concurs with the above recommendation from the Haldimand-Norfolk study and recommends that the new review proposed should include in its consideration the question of whether the situation at that time would indicate the desirability of the inclusion of the Brant area in determination of "what further changes may be needed".

4. Creation of a One Tier local government structure in Brant-Brantford

The proposal for the creation of a one tier local government structure was prepared by the City of Brantford. After reviewing several alternatives, the sub-

mission at Page 23 under the heading, "The Choice" - Structure states the basic City position in these words:

"Of the three alternatives considered above, the unanimous choice of the Brantford City Council is a single tier regional municipality embracing the City of Brantford and the County of Brant with certain special modifications designed to offset the principal drawbacks to the single tier structure."

Prior to reaching this conclusion, the report summarizes at Page 20 the principal advantages seen by the City of Brantford in a one tier system. These include "relative cost-effectiveness"; "avoidance of the cost of overlapping and multi-level co-ordination in the delivery of services"; "all resources are pooled for all purposes enabling, at least theoretically, the most equitable distribution in accordance with real needs and priorities"; "being the simplest, the single tier organization is the most readily understood by the electorate."

Following this at Page 21, the submission also discusses what are referred to as "some very obvious disadvantages to a single tier organization". Included in these is a recognition that "there are distinctly different kinds of services required within the various parts of the Brant area"; "that the rural components are protected from taxation for services

of a purely urban kind", and "the disadvantages which flow from the submergence of local identity in the larger unit".

The submission recommends that the first two of these disadvantages could be largely overcome or the undesirable effect mitigated by the creation of urban service areas. With regard to the third point, the submission suggests at Pages 21 and 22 that the old Police Village was a response to both the identity and urban service area problem and that a new adaptation of that basic technique may be devised to achieve a more contemporary solution. The submission also suggests at Page 22 that "Winnipeg's new Community Committees offer a precedent but not necessarily a model of how the decision making process can be divided between area-wide and localized issues, and "how the latter can be decentralized for resolutions at the local level".

At Page 29 this proposal is further detailed. In the opinion of the Commission, several very significant points emerge. The first is that rather than discussing Community Committees, the recommendation is now discussing Ward Councils. Within the terminology normally used relative to local government, the Commission finds a very significant

difference between a 'Community Committee' and a 'Ward Council'.

A second significant point in the mind of the Commission also arises at this point in the submission. After discussing briefly the variations possible in the establishment of Ward Councils, the brief concludes, "One favoured by the City of Brantford (but not necessarily to the exclusion of all others) would make provisions for Ward Councils in the two Rural Wards and in the Paris Town Ward. (It is not expected that such councils would be necessary in the City Wards).".

This proposal for Ward Councils in some municipalities and not in others was immediately dubbed by the news media as a 'Tier and a Half' proposal.

In the "City of Brantford Submission to the Brant Area Local Government Review - Supplementary Notes" the recommendation of the City relative to the status of Ward Councils was clarified. In these Supplementary Notes we find at Page 3 - "Thus it is expected that Ward Councils would be bodies corporate and that the Trustees, like Ward Councillors, would be duly elected by the votes of the ward".

Although the Commission finds much to commend the principles of the proposal

by the City of Brantford, the problems created by a two tier organization for some of the Brant area combined with a one tier organization for another part, would appear to create major administrative and functional difficulties. The problems created might well be greater than the benefits derived.

The City of Brantford submission at Page 23 under the heading "Structure" states - "Of the three alternatives considered above, the unanimous choice of the City of Brantford Council is a single tier regional municipality embracing the City of Brantford and the County of Brant, with certain special modifications designed to offset the principal drawbacks to the single tier structure.".

Unfortunately the 'certain special modifications' deemed desirable require the creation of local bodies corporate in some areas which in fact appears to negate the 'unanimous' choice of a single tier regional municipality.

The Commission does not recommend the creation of a single tier regional municipality for the Brant-Brantford area.

5. Creation of a Two Tier Government Structure in Brant-Brantford

The creation of a Two Tier Regional Government structure for the Brant area was recommended on a number of occasions but most coherently in the comprehensive submission from the Township of South Dumfries.

The Township brief examines the criteria recommended in provincial publications as guidelines for determining the size of regional units. The brief points out that the Brant area would not contain the suggested minimum desirable population and that the balance of interest criteria would be upset by the fact that 68% of the total area population would reside in the City of Brantford.

The brief then suggests that adher-

ence to all of the guidelines suggested in the provincial criteria could not reasonably be expected to be equally applicable in all situations. The brief argues that by far the most important criteria for a local government structure include a sense of community identity, a balance between accessibility and ability to provide services efficiently and an area in which the urban community and the rural area are functionally linked.

The brief holds that Brant County exhibits these most important criteria to a marked degree and therefore the brief recommends at Page 19 under the heading 'Structure' - "That a two tier system with one regional council and a number of lower tier municipalities be adopted".

Chapter Three

THE RECOMMENDED STRUCTURE

After a careful examination of the research material available to the Commission, a respectful and careful consideration of the numerous briefs and opinions presented to the Commission, and a thorough weighing of all of the factors involved, this Commission recommends a restructuring of local government in the Brant Area to provide a two tier government structure in the form of a restructured County of Brant to include four local municipalities of Brantford, Paris, East Brant and West Brant.

The names East Brant and West Brant are used herein for reference purposes only and are not to be read as a recommendation for names for these two proposed municipalities.

Tuscarora Township, which consists of the Tuscarora Indian Reserve and part of the New Credit Indian Reserve, would continue to be within the physical limits of Brant County but is not, of course, a

municipality for local government purposes.

It is recommended that the area of both the Town of Paris and the City of Brantford be considerably enlarged so that these two urban municipalities can accommodate the urban growth anticipated for a period of at least twenty years. A more detailed discussion of the recommended areas to be included in these municipalities is contained in the following chapter of this Report.

The new municipality referred to as East Brant would consist of all of the former Township of South Dumfries (except for those areas included in the expanded Town of Paris); that portion of the former Township of Brantford lying east of the Grand River (except for those areas included in the expanded Town of Paris and City of Brantford); and the former Township of Onondaga.

REPRESENTATION ON COUNTY COUNCIL

The new municipality referred to as West Brant would consist of the former Township of Burford and Oakland and that portion of the former Township of Brantford lying to the west of the Grand River (except for those areas included in the expanded Town of Paris and the City of Brantford).

Consideration was given in both the Haldimand-Norfolk Study and in the Brant Study to the desirability of making some minor alterations in the County boundaries to more closely reflect some apparent 'Communities of Interest'.

The Commission found no compelling arguments to support adjustments in the long established outer limits of the County and therefore recommends that the present County limits remain.

Historically, local municipalities within a County have been represented on County Council by the reeve and in cases where the local population exceeds 1,000 persons, by the reeve and deputy-reeve.

In the case of rural municipalities, the reeve is the head of Council but in the

case of towns, which form part of the County, the mayor was the head of the Council and he did not sit on County Council. The Commission believes that the head of the local municipality should sit on County Council to provide the desired flow of information between the County and the local municipality.

The Commission therefore recommends that the head of each of the four local municipalities would become, automatically, members of the County Council.

The Commission has given a great deal of consideration to the advantages and disadvantages of having County Council made up entirely of persons elected to also serve on the local municipal Council. Although this has been the case in the past and it might well be argued is the most desirable situation to provide for that interchange of information between the two Councils, the Commission has reached the conclusion from discussions with members of Regional Councils and County Councils that in light of the greatly expanded work load at both Council levels, it is impossible for the vast majority of people to give the time re-

quired to adequately perform both functions.

The Commission is equally concerned, particularly in the Brant area where a major imbalance between urban and rural population exists, that representatives from the individual municipalities should not be voting as a block representing a particular municipal interest. Rather, they should be voting as individuals representing the best interests of the County as a whole, and secondly, the interests of the people whom they are elected to represent rather than the interests of any particular municipality.

The Commission therefore recommends that election to County Council be on a ward basis and that County Councillors with the exception of the head of Council should not serve on the local municipal Council.

While the Commission recognizes certain disadvantages in this proposal, the following factors appear to the Commission to strongly support the foregoing recommendation:

1. The key element favouring the democratic system is the ability of those governed to make known to those who have been elected, their wishes, desires, and problems. Experience would indicate that citizens find it difficult to approach a Council but find it much less difficult to approach their local ward representative on Council.

2. When elected on a ward basis, a representative tends to more clearly represent people rather than to represent a particular municipality.
3. If representatives must serve on both the local Council and the County Council, there is a great danger that the work load imposed in serving on two Councils would eliminate a great number of people from being able to serve because of the excessive demands on their time.
4. A Council, to act wisely, must not be so overloaded with work that they have insufficient time to consider the matters which come before them for decision.
5. If Councillors serve on both Local and County Council, they may frequently be faced with the problem of attempting to serve two masters. Although to a great extent the County responsibilities and the Local responsibilities will be quite different, none the less, it appears to the Commission that Councillors must be free from any parochial approach and that their responsibility is to the Region and to the electors whom they represent.

Returning the City of Brantford as a part of the County system creates some very difficult problems related to proper representation at the County level. At the present time, the City population is slightly in excess of 62,000 people, which represents approximately 70% of the approximately 90,000 total population in the Brant area.

The realignment of municipal boundaries as recommended in this report would increase the Brantford population to approximately 66,000 or 74% of the total Brant area population.

A strict application on a numerical

basis of representation by population would therefore indicate that the City of Brantford should be allocated 75% of the total number of members on the County Council. It is the opinion of the Commission that such representation imbalance could not possibly serve the best interests of either the City population or the population of the other municipalities proposed to make up the County of Brant.

The Commission believes that the principle of representation by population must be that people are equally represented rather than that each Councillor should represent an equal number of people. The Commission does not believe that one member representing 6,000 people in the whole of the East Brant Municipality provides equal representation to one mem-

ber representing the same population within a relatively small and compact ward within an urban centre.

The Commission does accept the principle that the residents in the urban areas are in the majority and therefore should have the majority of the representation at the County level, but also finds that the majority should not be so large that not only are the residents of the other municipalities not equally represented, but, in fact, would have little effective representation.

To provide what the Commission deems to be a reasonable distribution of representation, it is recommended that County Council members be directly elected on a ward basis in accordance with the following table:

RESTRUCTURED BRANT COUNTY COUNCIL REPRESENTATION

Municipality	Approximate Population	Number of Wards	Representatives per Ward	Representatives on County Council	Average Population per Rep.
Brantford	66,000	5	2	10	6,600
Paris	7,000	2	1	2	3,500
East Brant	6,000	2	1	2	3,000
West Brant	11,000	3	1	3	3,665

In addition to the foregoing, the Head of each local municipality shall be a member of County Council making a total Council numbering 21.

County Wardens have historically been chosen by and from the members elected to serve on County Council. The Commission recommends that this method of choosing the Warden continue with the exception of the first term.

Because of the major restructuring in the County system recommended by this Report, it must be anticipated that a substantial lead time be provided to allow for the reorganization to take place prior to the actual establishment of the revised County structure. It is obvious that someone will be required to be responsible for this major reorganization work and it is therefore recommended that the first Warden in the restructured County be appointed by the Province to serve a three year term, and that this appointment be made at least four months, and preferably six months, prior to the actual effective date for the beginning of the operation of the new County structure.

It is recommended that future Wardens would be elected by the County Council from among its own members in the historic pattern.

Experience would seem to indicate that a three year term for elected representatives has many advantages over a one or two year term. During the interview and data collection phase of this study, a substantial number of persons with long association and service in the local government field, have expressed the opinion that local Councils appear to operate most efficiently with a three year term of office.

It is therefore recommended by the Commission that members elected to County Council be elected for a three year term of office and it is also recommended that a three year term also apply in the restructured local municipalities as recommended in this Report.

Chapter Four

PRINCIPLES IN ESTABLISHMENT OF LOCAL MUNICIPAL UNITS

The recommended reorganization of local government structure in the Brant area includes the reduction of the total number of municipalities to enlarge and strengthen each proposed local municipality. Revised local municipal structure is recommended on the basis of a recognition of community of interest, particularly as this is reflected by the service needs to which the local municipality is expected to respond. The basic division is urban and rural.

It has been frequently argued that the 'needs' of people are basically the same in both urban and rural areas and therefore the distinction between urban and rural becomes unnecessary when related to local government structure. Although the Commission agrees that the basic needs are similar, none the less it is also convinced that the 'degree' or 'standard' of service required of local government in City or Town and in a rural area is sufficiently different that separate local government structure is desirable to best serve the needs of each.

Four local municipalities are propos-

ed within the reorganized County of Brant. Two are urban - Brantford and Paris, and two are rural - East Brant and West Brant. The urban municipalities will continue to have the responsibility of providing those standards of urban services required to support a complete range of urban uses. The rural municipalities will continue to be responsible for the provision of that quite different standard of service required to support a predominantly rural population.

It is the belief of the Commission that this basic division is desirable not only so that local government can best respond to the wishes and needs of the residents it serves but also because under this time-honoured division it is possible to implement what the Commission believes must be a basic principle. That is, that the taxpayer should be financially responsible for only those services - and that standard of service - which he requires and from which he directly benefits.

One of the most frequently expressed concerns with any proposed reorganization of local government structure is the increase of costs to the taxpayer. Where direct benefit can be seen through im-

provement in service provided, cost increases are bearable. Where the direct benefit is less obvious or where the standard of service exceeds what the resident feels is required, the added costs are difficult to accept.

It is the Commission's opinion that in our enthusiasm to improve local service and to respond to changing needs, it is possible to move too quickly and too far. In the Brant area the standard of services presently provided by local government is - in the main and with a few notable exceptions - found to be adequate and satisfactory to the residents. The Commission feels it is both unnecessary and improper to impose a government structure or a service standard exceeding that required to provide a standard of service acceptable to the residents.

If the principles outlined above are to be reflected in the proposed reorganization of local government structure in the Brant area, it is the opinion of the Commission that the two basically urban municipalities and two basically rural municipalities as recommended can best

- a) Provide strengthened and enlarged local government units but keep local government responsive to resident's needs;
- b) Provide local government units based on true community of interest and service needs;

- c) Provide the varying standards of service required to respond to different needs;
- d) Provide assurance in so far as it is possible that the taxpayer will pay only for those services from which he directly benefits;
- e) Provide control of overall cost increases.

PRINCIPLES OF LOCAL MUNICIPAL LIMITS

The thrust of the recommended restructured local government in this report is the recognition first that local government exists only to provide those local services required by its residents and secondly, that there is a significant difference in the standard of service required by urban and rural areas. From this contention evolves the recommendation for urban and rural municipalities, established to respond to these differing needs. If this division of responsibility and costs is to remain a valid concept, it is obvious that future growth must be directed in such a manner so that the basically rural municipalities remain rural in nature and that urban growth takes place in the urban municipalities.

To accomplish this, consideration must be given in the defining of limits of the recommended municipalities to assure that there is adequate land available within the urban municipalities to allow

for the urban growth expected. The Brantford Urban Growth Study - August 1972, is a very comprehensive review of urban growth factors relative to the City of Brantford. This study considers the past population growth of both the City and the County and provides a population projection to the year 1981 for the County and to 1991 for the City and the Township of Brantford.

Based on these projections and all of the other factors considered in the study - including servicing patterns and the considerable urban growth which presently exists beyond the City limits - the report concludes that approximately 4,700 acres of land beyond the present limits of the City of Brantford will be required to accommodate the urban growth anticipated "for the next 20 years". The report also indicates that an urban population in excess of 1,700 persons presently exists within the 4,700 acres defined in the report as future urban growth area.

The Brantford Urban Growth Study then proceeds to the problem of the control of urban growth beyond the areas outlined as being necessary for the twenty year growth period.

On the argument that urban growth taking place beyond the City limits will

ultimately require the provision of urban services which only the City is prepared to provide, the Brantford Urban Growth Study concludes that there must either be assurance that uncontrolled urban growth will not take place beyond the limits of the urban municipality or that the City must have control in an area of nearly 13,000 acres beyond the present limits to protect against uncontrolled and premature urban development.

The concern expressed in this report related to urban growth immediately beyond the urban municipal limits is far from unique to the Brantford area. It has been, at least in part, the basis of some hundreds of annexation applications across Ontario during the last twenty years. In the opinion of the Commission, it is a legitimate area of concern.

The undesirable ramifications of frequent municipal boundary adjustments has been amply illustrated by the annexation fever of the last twenty years. The Commission therefore concludes that the establishment of new municipal boundaries must make ample provision for the accommodation of future urban growth within the defined urban centres and in so far as possible to define boundaries related to physical or geographic features which can pro-

vide a clear cut physical as well as political boundary. The reorganized structure of local government must also provide machinery to control and limit urban uses in rural municipalities.

PROPOSED MUNICIPAL BOUNDARIES

In this Report the Commission does not intend to attempt a metes and bounds description of the suggested new municipal limits. Rather the Commission will deal in some detail with what it considers to be the principles of boundary determination and would recommend that the detailed definition of limits be the subject of recommendations to the Minister by a committee of local politicians and staff whose intimate knowledge of the areas, people, and properties involved can provide a much more suitable boundary detail recommendation. The Commission recommends that this local boundary committee be given freedom to define recommended boundaries so long as such boundaries reflect the following principles:

1. The boundaries will provide for stable municipal limits for a period of at least twenty years.
2. The boundaries will, so far as possible, coincide with physical features to provide a physical and visual demarkation between municipalities.

Following is a brief discussion of those major physical features which the Commission recommends should be recognized in the definition of municipal limits of the urban municipalities.

CITY OF BRANTFORD

1. The North East and East

The Fairchild Creek with its broad meanders, flood plain areas and deeply incised valley, forms a natural and obvious physical limitation to the urban growth of Brantford to the east. The ultimate easterly limit of Brantford should relate to this physical feature, leaving the actual valley which should not become urbanized, in the proposed rural municipality of East Brant.

The Brantford Urban Growth Study recommended the annexation of the majority of the lands lying between the present easterly limit of the City of Brantford and the Fairchild Creek valley. The proposals in that study generally correspond to the Commission's recommendation relative to municipal limits in this area.

2. To the South

The present south limit of Brantford is clearly defined by a very large oxbow in the Grand River. Within this loop which lies in an east-west alignment are very extensive areas of flood plain lands which obviously cannot support urban uses.

The Commission recommends that this broad and clearly defined barrier to urban growth continue to be recognized as the permanent southerly limit of the Brantford urban growth.

3. To the South West

Several clearly defined drainage creeks flow from the west to join the

Grand River just south of Brantford. The flow of drainage in these valleys is not toward the Brantford sewage treatment plant, and the very rough topography in this valley indicates that this drainage area should remain part of the rural municipality of West Brant as a permanent limit against the Brantford urban growth area.

4. To the West

To the west of Brantford are substantial land holdings of a provincial land assembly scheme. Although no representations were made to the Commission regarding these lands, it must be assumed that they are potential urban development areas and should be incorporated into the municipality which can provide the full range of urban services such development would require.

Although the Brantford Urban Growth Study at Page 47 under the heading, "Sanitary Sewerage System" would indicate that a planned "Southwestern trunk sanitary sewer" when constructed could provide outlet for a greatly extended area south west of the City (estimated in excess of 8,000 acres), the report also indicates that such an extensive area would not be required to accommodate anticipated growth for the next twenty years.

Although physical demarkation is not as apparent in this sector, this report recommends that the limit between Brantford and West Brant should generally follow the westerly limit of the Ontario Housing Corporation lands.

5. North West Quadrant (west of the Grand)

To the north of the road commonly referred to as the Old Burford Road and in the area west of the Grand River are extensive gravel pit operations and the very large holdings of the Grand River Conservation Authority, much of which is flood plain land. Together with the Grand River itself, these features constitute a clear physical demarkation and the Commission recommends that the limit be-

tween Brantford and West Brant continue to fall along the east bank of the Grand River in this area.

6. North West Quadrant (east of the Grand)

To the north west of Brantford, north east of the Grand River and south of the proposed location of the extension of Highway 403 is a large area which will be physically separated from the proposed East Brant by 403 highway.

In spite of this clear physical demarkation, an examination of the physical characteristics of this area, particularly the large areas of flood plain and major gravel pit operations, would not suggest this as an area for future urban uses.

The Commission therefore recommends that this area should remain part of the predominantly rural East Brant Municipality and that the existing limits in the north west corner of Brantford should not be substantially altered.

7. North of Brantford

To the north of Brantford both north and south of Power Line Road are extensive areas of existing urbanization and of proposed and potential urban growth areas. A number of submissions to the Commission indicated the desirability of the immediate provision of urban services and particularly a sewage collection system to these existing urban developments. All parties appeared to agree to the need for the provision of these urban services to this area although there was some difference of opinion as to the jurisdiction under which these areas should be serviced. There seemed to be no disagreement that the required services should be tied into the Brantford system.

Again referring to the Brantford Urban Growth Study at Page 47, under the heading "Sanitary Sewerage System", the Commission is informed that "The Eastern Circumferential Sewer which has now been constructed

from the sewage treatment plant to Henry Street will service an area of approximately 5,569 acres shown as Area 1 on Plate number 9."

Reference to Plate number 9 in the report indicates that the area referred to would include the existing urban development beyond the City limits and south of Power Line Road and in addition a strip of land approximately 1000 feet deep lying north of Power Line Road in Lots 28 to 36 inclusive, Concession 1.

The north limit of this service area would appear to correspond roughly with the marked physical features of the deeply incised valley of the tributary streams feeding the Fairchild Creek.

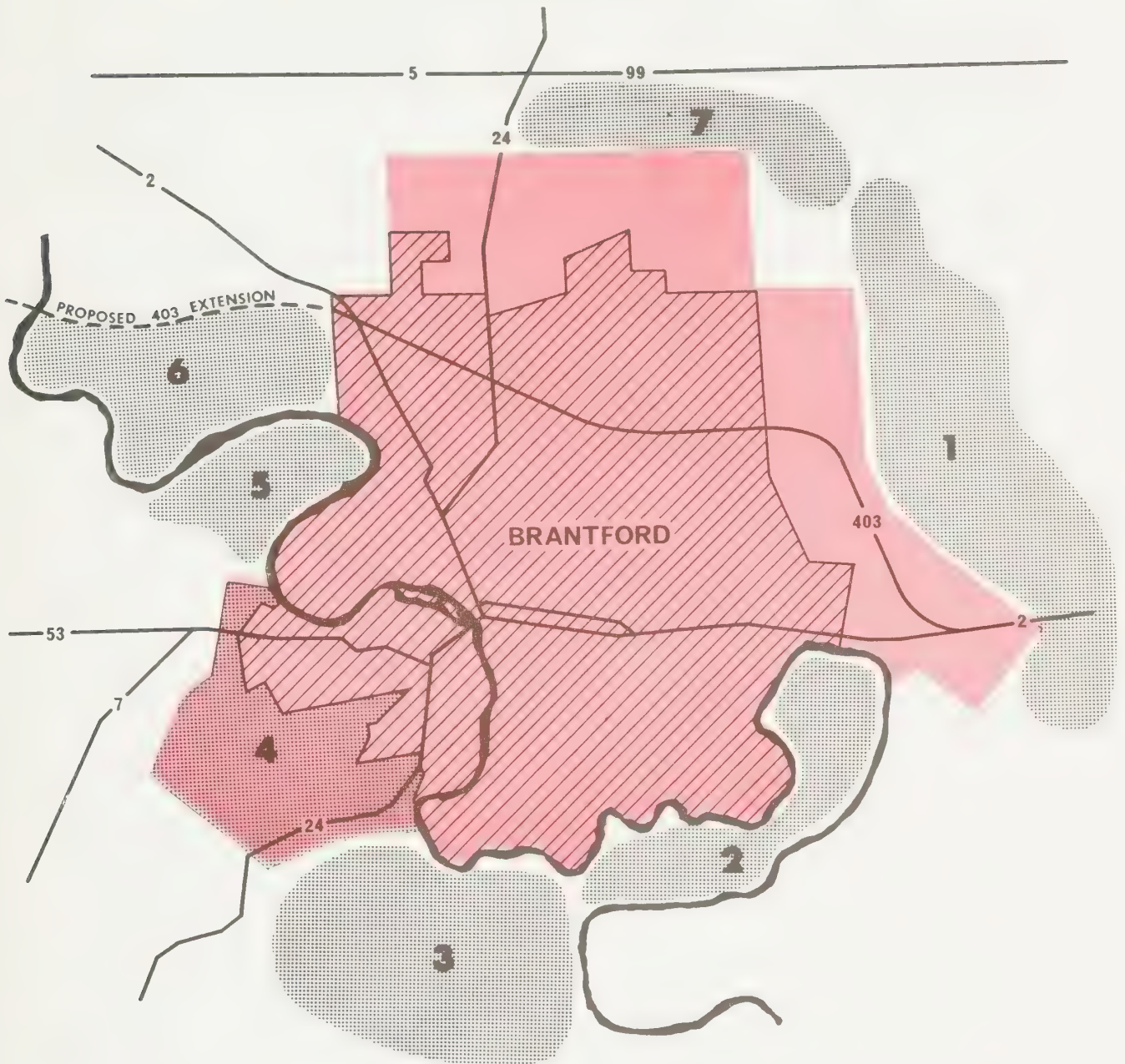
The creek (commonly referred to as Jones Creek) and its immediate valley lie in an east-west direction roughly

parallel to Power Line Road and the creek and valley lands are indicated on the proposed official plan of the Township of Brantford Planning Area in an Open Space designation.

The Commission recommends that the limit between Brantford and East Brant in this area follows the limit of the area which can be served by the Brantford Eastern Circumferential Trunk Sanitary Sewer. This line would fall roughly parallel to and approximately 1,000 feet north of Power Line Road.

The Commission recommends that the revised limits of Brantford should be based upon the recognition of the foregoing physical features and as previously stated, the precise boundaries should be considered by the suggested local boundary committee and recommendations forwarded to the Minister.

Suggested Enlarged City of Brantford



KEY



INDICATES AREAS OF PHYSICAL
LIMITATIONS TO GROWTH -
SEE TEXT

TOWN OF PARIS

The physical features which would provide clearly defined municipal boundaries are less obvious in some parts of the Paris area than they appear to be in the Brantford Area.

The Commission also found that whereas the City of Brantford had prepared and presented to the Commission a detailed study not only of future growth projections but also of areas which could reasonably be serviced to provide for this growth, the Town of Paris provided little in the way of guidance or recommendation in this regard.

Although the Town of Paris supported the County's submission which proposed that a municipality which would be made up basically of the existing Town of Paris and that part of South Dumfries Township west of the Grand River be created as a new municipality, the Commission found little real justification or basis for this definition in either the County brief or the submission by the Town of Paris.

Returning to the Commission's basic theory that local government units should be based primarily on a need for common standards of services, the Commission found little in common in service standards between the urbanized Paris area

and the very rural South Dumfries Township.

The Commission therefore recommends that in defining the physical limits of the new Municipality of Paris, these limits should be related to the following physical features:

1. To the South and Southwest

The Commission was rather surprised that during hearings there was so little reference to the proposed extension westerly of Highway 403. The Commission recalls that following the construction of Highway 401 nearly all municipalities along or close to the route of this highway found that control of a direct highway access to this major highway was vital to their future.

The Commission anticipated that the Town of Paris would submit that Highway 24a leading directly from the Town to a proposed cloverleaf on the new 403 was of vital concern to the Town. It is the opinion of the Commission that this highway link and the control of lands abutting it will, in fact, be of vital concern to the Town of Paris in the future and that the Town should be in a position to assure that the traffic carrying capacity of this road is not destroyed by inappropriate or inadequate control of abutting land uses.

The Commission therefore recommends that the limits of the Town of Paris be extended in this area on a line west of and parallel to Highway 24a to the north limit of the proposed Highway 403. The Commission suggests that the existing H.E.P.C. power line might constitute an appropriate municipal limit in this area.

2. To the West

The major drainage valley and flood plains of the Nith River combined with the very large existing gravel pit operation appears to be a clear

and obvious limitation to urban growth to the west of the present Town of Paris and it is therefore recommended that the existing westerly limit of the Town of Paris remain, except for such relatively minor adjustments as may be deemed desirable to allow for the inclusion within the Town of Paris of certain gravel pit areas being considered as possible sanitary land fill sites.

3. To the East

To the east and southeast of the Grand River, the present urban development has been limited by the location of a very extensive gravel pit operation in this area, and these expanding operations will prove to be a continual deterrent to urban growth in this area.

There are lands directly south of Paris and east of the Grand River which might well be included within the Town.

It is therefore recommended that the limits of the Town of Paris on the east side of the Grand River be ex-

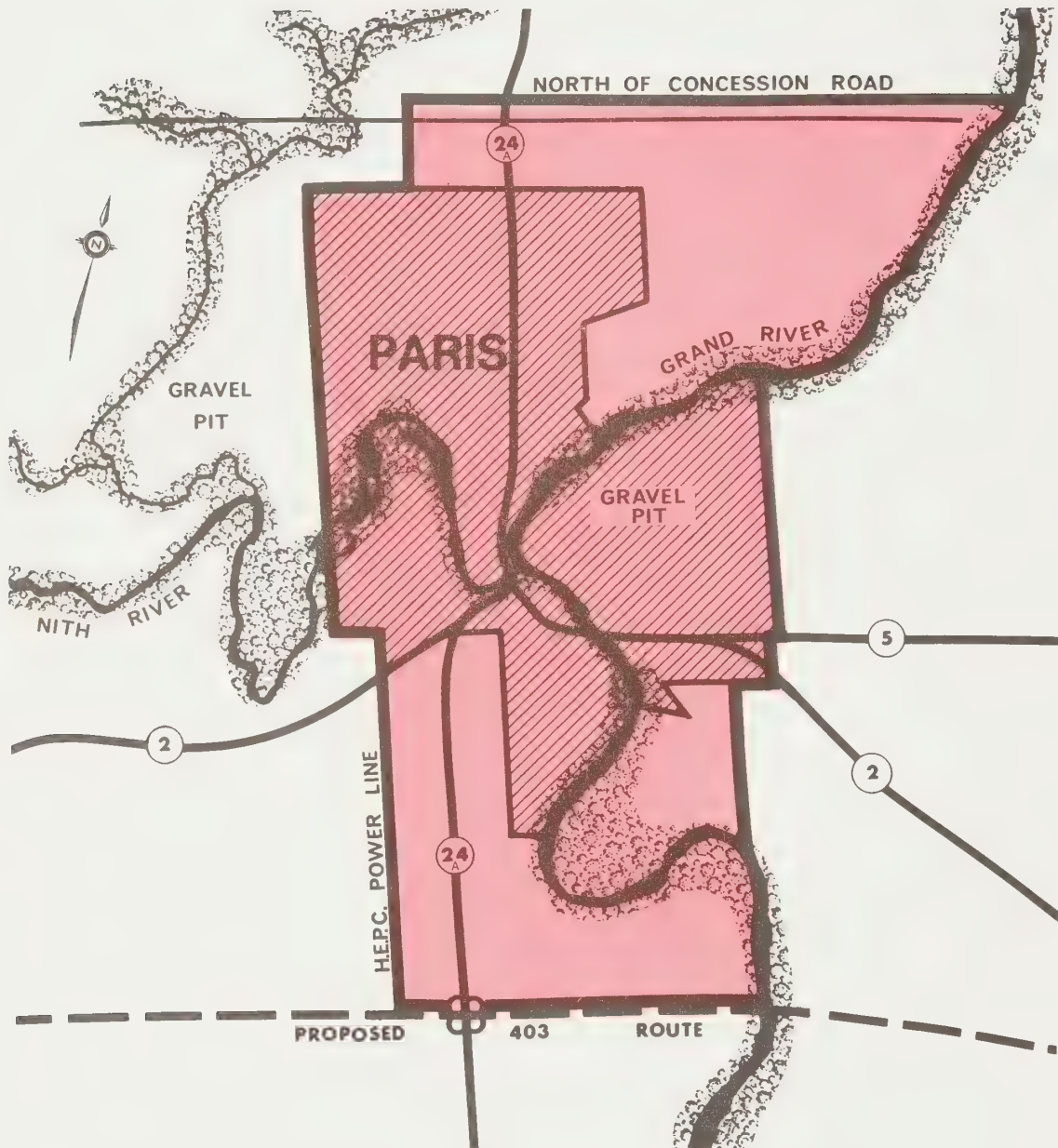
tended southerly on a line which would approximately follow the extension southerly of the centre line of Green Line Road to the Grand River and thence southerly along the centre line of the Grand to the proposed Highway 403.

4. To the North and Northeast

To the north and northeast of the present limits of Paris are extensive areas of potential development lands, and the present development patterns particularly with regard to industrial growth suggest this general area as future urban land.

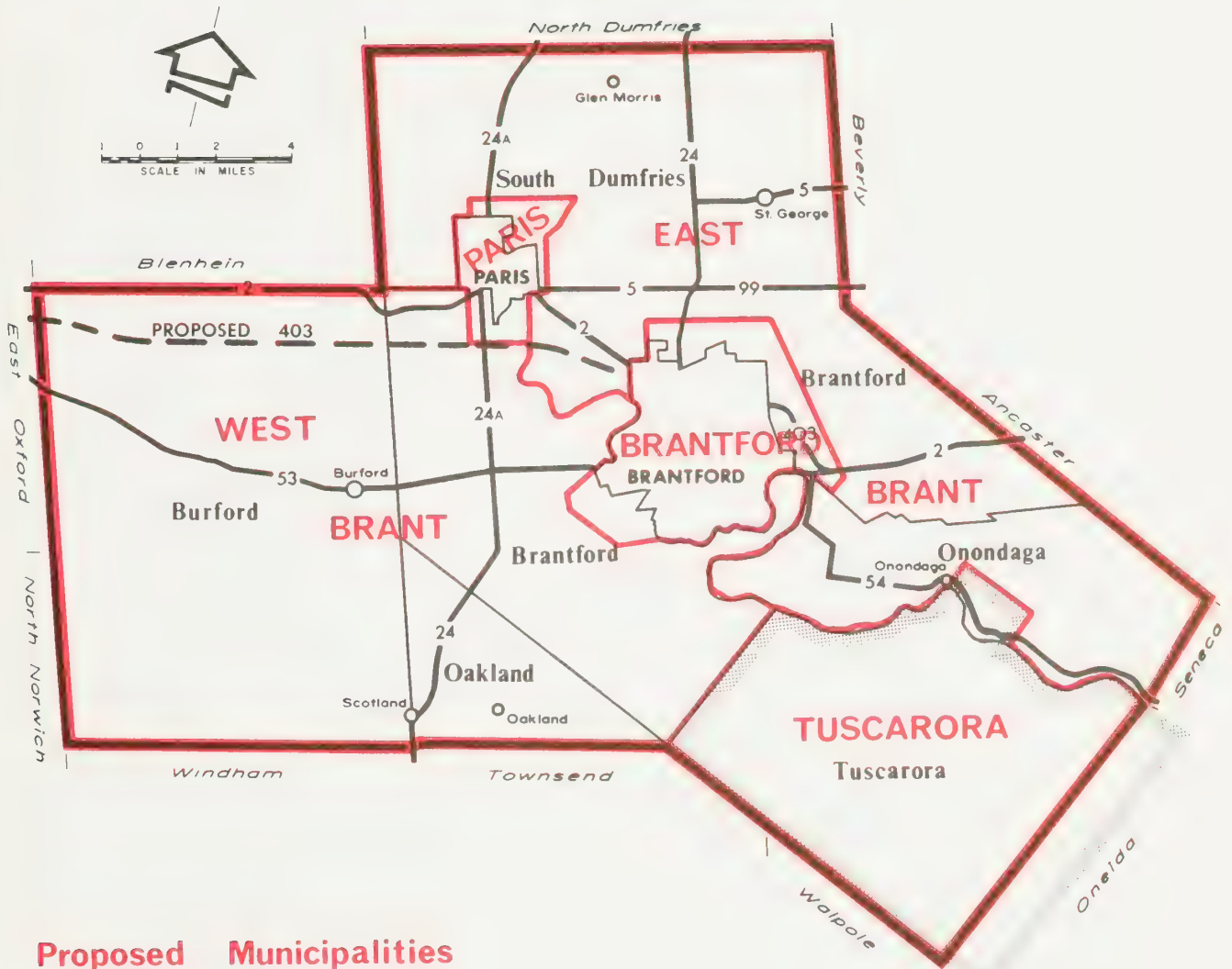
To provide for the continued urban growth of the Town of Paris, it is recommended that the northerly limit of the Town of Paris should be extended to the north to a line roughly parallel to and north of Township Road allowance between Concession II and III West of the Grand River, and that the north limit should extend easterly to the Grand River and thence downstream to rejoin the existing limits of the Town of Paris.

Suggested Enlarged Town of Paris



THE LIMITS INDICATED FOR THE ENLARGED TOWN OF PARIS ARE DIAGRAM-
MATIC ONLY, INTENDED TO ILLUSTRATE THE PRINCIPLES RECOMMENDED
IN THIS REPORT.

Restructured Brant County



Chapter Five

PLANNING

The existing Planning arrangements within the Brant Area are outlined in Resource Material Bulletin Number 15.

It is not the Commission's intent in this Report to restate the information provided in the Resource Material Bulletins and it is strongly recommended that these bulletins be used as reference in conjunction with the reading of this Report.

From Resource Material Bulletin No. 15 dealing with the existing planning arrangements, several significant points arise:

1. All municipalities within the Brant area have Official Plan documents either approved by the Minister or completed in draft form.
2. All municipalities in the Brant area have comprehensive zoning by-laws with the exception of Brantford Township whose Restricted Area By-laws cover parts only of that Municipality.
3. The City of Brantford is the only Municipality in the Brant Area with full time planning staff. The other municipalities in the Brant area have made use of Consultants for specific projects and have received part time assistance in some cases from the staff of the Brant Area Planning Organization.
4. The Brant Area Planning Board has been in existence since 1965 and all Brant Area municipalities are represented on this Board. Although the Board would appear to have served a

valuable function in providing local municipalities with some form of planning service and co-ordination, the Board's effectiveness as an overall planning organization appears to have been neutralized to a very large extent through a combination of inadequate staff, lack of strong leadership and inter-municipal conflicts.

5. Although the City of Brantford maintains a full time planning staff, there would appear to be little, if any, direct discussion between the Planning Department and the Council. It would appear that planning recommendations filter through other committees, particularly the Works and Traffic Committee, to Council. The Planning Director would appear to be responsible more directly to the City Engineer than to the Council. This appears to the Commission to be a most unsatisfactory arrangement which might be compared to a situation where the architect for a large building reported to his principals through the plumber.
6. There would appear to be areas of conflict between the Brant Planning Board and the local Planning Boards because of an apparent similarity in their terms of reference. There would appear to be confusion in the minds of both bodies in exactly who is to be responsible for what. Several examples of this conflict were recited to the Commission and in some cases it would appear that recommendations coming from the Brant Planning Board were considered by the individual municipalities as an improper interference with local decision making powers.
7. The Commission had the impression that although all of the municipalities discussed the need for stronger planning con-

trol within the Brant area, that in common with many municipalities, there remained a failure to appreciate the importance or significance of the planning function to a municipal organization. On a number of occasions the Commission felt that a Planning Board was tolerated by Council because it was something that had been thrust upon them by Provincial legislation but that the Planning Board, in fact, amounted to a group of well-meaning amateurs dabbling in land use control with little appreciation of the practical or political implications of their meddling.

As an outcome of the research phase of the Study, and after hearing the submissions of the municipalities generally, and the submission of the Brant Area Planning Board specifically, it is evident that there is an obvious need for a greatly strengthened planning function serving all of the Brant Area; that the planning process in the Brant Area needs strengthening, simplification, accountability, adequate resources, competent staff, reduction of internal conflicts, if it is to provide the desired development, control and guidance within the Brant Area.

To fulfil these objectives, the Commission recommends:

1. That all Planning Boards and Planning Areas within the Brant Area with the exception of the Brant Area Planning Board and Planning Area be dissolved.

2. That a County Planning Committee made up of all members of County Council become responsible for all planning functions within the Brant Area, and that they appoint an adequate and qualified planning staff to work under the direction of the Planning Committee to provide the required technical assistance and input into the County Planning function.
3. That the Council of any local municipality may, if it desires, appoint the local Council as a Planning Committee to advise the County Planning Committee on matters of local concern, and local interest. When a local municipality does constitute the Council as a Planning Committee, the County Planning Committee shall refer to the local Committee all applications for amendments to the Official Plan, applications for amendments to the Zoning By-law, and subdivision applications for development proposals directly affecting that Municipality, for comment and recommendations.

In any case where the County Planning Committee makes a decision which is contrary to the recommendations of the local Municipal Planning Committee, such recommendation shall only be passed by an affirmative vote of at least two-thirds of the County Planning Committee.

In the matter of Official Plan Amendments and Zoning By-law changes, the local municipality shall retain the right of appeal to the Ontario Municipal Board.

4. Where a local Council has constituted itself as a Planning Committee, the County Planning Committee may delegate to such local Planning Committee such of its powers relative to that Municipality as it deems proper.

All local municipal Official Plans and Restricted Area Zoning By-laws shall remain in force until a comprehensive Official Plan for Brant County has been prepared and approved by the Minister. Following the approval of the County Plan, all existing local Official Plans shall be repealed.

6. In that there are Official Plan documents in existence for all municipalities within the Brant Area, the Commission feels that every effort should be made to formulate a County Policies Plan based on the existing Official Plan Studies.

In the legislation which has established a number of regional municipalities in the Province of Ontario, provision has been made for the preparation of an Official Plan over a period of some three to five years. It is the Commission's opinion that this long hiatus period has created and is creating serious difficulties in these new regions in that it has been the natural inclination of the Region and its planning organization to attempt to stop, delay, or defer all decisions over this three to five year period until an Official Plan document is prepared.

In the case of the Brant Area where careful consideration has been given to Official Plan policies in each of the municipalities, it would appear unnecessary to inflict this long area of uncertainty on the reorganized local government and the residents of the area.

The Commission therefore recommends that the County Planning Committee prepare an Official Policies Plan for the Brant Area setting forth major development policies within a period of not more than one year, and that these policies be used to guide the development and growth of the Brant Area until such time as this Policy Plan can be enlarged and extended by amend-

ment to provide a comprehensive Official Plan for the Brant Area.

7. That when the above recommended Policy Plan has been approved by the Minister, that the Minister delegate to the County of Brant such of his powers as are being delegated to Regional Municipalities in Ontario.

The submission of the Brant Area

Planning Board recommends that a revised planning structure provision be made for the establishment of Citizens' Planning Committees in Wards to act in an advisory capacity.

The Commission appreciates the desirability of public participation in the planning process and agrees that such participation is most useful and effective on a neighbourhood or ward basis.

The Commission recommends that every opportunity and encouragement should be given to the establishment of Ward Planning Committees and that the duties of the County Planning staff should include the provision of technical assistance to such Committees.

LAND SEVERANCES AND COMMITTEES OF ADJUSTMENT

Committees of Adjustment presently exist in the City of Brantford, the Town of Paris and the Townships of Brantford, South Dumfries and Onondaga. No Com-

mittee of Adjustment exists in Burford or Oakland and severance applications in these two Municipalities are handled by the Minister.

Although most operating Committees have Official Plan policies to guide their consideration of severance applications, concern was expressed on a number of occasions with the uneven application of sound planning principles by the various Committees. This situation cannot be unexpected where there are a group of municipalities with divergent interests and philosophic approaches to the question of urban development.

Committees in most municipalities have been operating in the past with little professional guidance or staff and under the constant pressure of an almost personal relationship with the applicants. Several instances were reported where serious areas of conflict have arisen between the Committees and the Councils who have been subjected to political pressures in the matter of applications for consent to sever.

The evidence would seem to indicate

that the present system for consideration of land severance applications suffers from a number of weaknesses including:

- a) A variety of policy guidelines.
- b) Differing philosophic approaches to the matter of urban growth in predominantly rural areas.
- c) A lack of staff and technical assistance to aid Committees in carrying out their duties.

Although the Commission recognizes that detailed severance policies may well vary from municipality to municipality, experience would suggest that lack of a consistent 'approach' to the question of severance applications can do much to destroy effective land use planning.

The Commission recommends:

1. That legislation be enacted to establish a County Land Division Committee and that the powers to grant land severances throughout all of the Brant County municipalities be vested in the Land Division Committee.
2. That the four local municipalities recommended in this Report each have a Committee of Adjustment empowered to consider variances only.
3. That the Brant County planning organization recommended in this Report be responsible for providing technical assistance to the Land Division Committee.

Chapter Six

POLICE PROTECTION

Resource Material Bulletin Number 7 provides a summary of the existing Police services within the Brant Area. Municipal Police forces exist in the City of Brantford and the Town of Paris. Policing in the Township of Brantford is provided on a contractual basis by the Ontario Provincial Police and Provincial Police service is provided to all other municipalities within the Brant Area.

The research carried out in connection with the present police services in the Brant Area would appear to indicate that the opinion of the Police Chiefs and the professionals in police work is that there would be advantage to the creation of a County Police force. The politicians, on the other hand, as witnessed by the brief submitted by the various municipalities, have indicated their concern with the very substantial cost increase for police protection where Regional Police forces have been established. Additional policing costs were cited most frequently in both the submissions and in all representations made to the Commission as the outstanding example of cost increases to the citizens in the formation of regional

government.

At the present time, municipal Police forces provide service to approximately 70% of the population of the Brant Area and it appears to be the opinion of the professional police officers in the Brant Area that because of the compact nature of Brant, a single police force could reasonably provide the required service to the remaining Brant Area population.

In a recent study of the Police protection provided in the City of Brantford entitled "A Study of the Brantford Police Force - 1971", certain weaknesses were revealed in the existing Police operation, particularly in the fields reporting and recording procedures, and the Study recommended the establishment of a central Record Division which would be available to all force members and the general public on a twenty-four hour basis. This new Division was to encompass such services as communications, complaint centre, summons and warrants, licensing, identification, court officer and transcribing and maintenance of all police records and statistics. It is within this field and within the area

of specialized police services that problems have been encountered in smaller municipal Police forces. This weakness was recognized with regard to the Paris Police force.

The research also indicated the degree of co-operation which was required between the City Police Department, Paris Police Department and the Ontario Provincial Police. Some of these areas of co-operation are noted in the Resource Material Bulletin dealing with Police Protection.

In the opinion of the Commission, Police service for the residents of the Brant Area could be improved by the creation of a single County Police force. Such a single force could make maximum use of all of the technical and sophisticated skills required to deal with the increasing and complex criminal activities that Police officers must contend with today. Such a force could provide for those services which are discussed above, on a County basis.

That these specialized skills and services should be available to the Brant residents is obvious. That they cannot be provided by three or four separate Police forces in this relatively small area is equally obvious.

The Commission therefore recommends the establishment of a Brant County Police force to provide Police service to all residents of the Brant Area.

In making this recommendation, the Commission is acutely aware of the concern expressed relative to cost of such a Police force. To minimize and equalize these costs relating to services provided, the Commission recommends:

1. That the Brant County Police force be organized in two divisions. One division would provide the very sophisticated police service required, and now provided in the urban municipalities. The second division would be responsible for providing only that standard of service required by the rural municipalities on a basis comparable to the type of service presently being provided by the Ontario Provincial Police, but with the added benefits of having available the central records division and the desirable technical and specialized police services possible within a County Police Force.
2. In accordance with the basic principle adopted in this Report, that in the matter of service the taxpayer should pay only for those services from which he directly benefits, the cost of police protection should be related to a service area basis. In this proposal, the taxpayer in the rural municipality would pay only for the standard of service required and the residents of the urban municipality would be assessed a higher rate for police protection to reflect the higher standard of service provided.

3. That a Provincial grant for police service equal to the grants provided for regional police forces be provided to the Brant County Police Force, and that such Provincial grants include transitional grants to assist in the recommended reorganization of police services in the Brant Area.

The Commission believes that if there is recognition of the fact that police protection in rural areas need not approach the standard of that provided in urban areas, and if the cost for police protection reflects these different standards, and with the provision of a substantial additional grant as recommended, that the advantages of a single police force serving the Brant Area can be realized without substantially or unreasonable increasing the costs to the taxpayer.

FIRE PROTECTION

Resource Material Bulletin No. 6 summarizes present fire services provided in the Brant Area. Only the City of Brantford has a full time Fire Department and the remainder of the area is served by volunteer brigades with the exception of Brantford Township which has a full time Fire Chief.

The Commission was impressed

with the number of submissions made from both full time and volunteer firemen and fire brigades concerning the matter of fire protection in any reorganized government structure in Brant. The deep interest and careful thought expressed in these briefs are indicative of the dedication and the concern of the firefighters in the Brant Area in assuring a continuation of the high standard of fire protection services that have been provided.

In the main, the burden of the submissions made concerning fire fighting services seemed to support the opinions expressed by the Ontario Fire Marshal of the desirability of retaining the volunteer fire brigades except in large urban areas.

The research carried out and the submissions made to the Commission would all indicate that a high standard of service is being provided in all of the Brant Area and that the Brant County Mutual Aid arrangement has been working satisfactorily.

Per capita costs for fire protection show fairly broad range from \$19.46 per capita in the City of Brantford to a low of \$2.00 per capita in the Township of Burford. The Commis-

sion believes that these costs relate to the needs of the various areas and that the difference in per capita costs do not suggest comparable differences in the standards of service provided.

It seems to be the unanimous opinion of the Ontario Fire Marshal, the Fire Chiefs in the area, and the Fire brigades that both permanent and volunteer forces must continue to exist to provide adequate and reasonable fire protection within the Brant Area. No suggestion has been made that a single permanent fire force should or could be established on a County basis.

Most of the professional Fire fighters in the Brant Area seem to support the principles established in the recommendations of the Ontario Association of Fire Chiefs, that a County Fire Co-ordinator should be appointed together with a core

administrative unit and personnel at the County level to provide the services presently provided by the Fire Co-ordinator under a County Mutual Aid System, together with training facilities, central purchasing and maintenance, fire inspection and prevention services, and central administration.

The Commission recommends:

1. That the responsibility for fire protection remains the responsibility of the local municipality.
2. The establishment of a core administrative unit and personnel at the county level to provide fire co-ordination, training, central purchasing, and maintenance of apparatus and equipment to carry out fire inspection and fire prevention services and administrative services for the Brant Area.
3. That in the establishment of such a county administrative core, the legislation clearly define the duties and responsibilities of both the core unit and the local municipal fire department.

Chapter Seven

In all municipalities, the road system provides two functions. The first is to allow for the movement of people and goods within and through the municipality and the second is to provide a land service function. Although many roads at the present time are attempting to serve both of these functions, it is increasingly apparent that in many cases these two are becoming mutually exclusive.

Heavy traffic increase destroys the desirability of a living location adjacent to a major traffic street and the many access points required to provide the land service function destroys the traffic carrying capacity of the street.

The following Table provides a breakdown of road classifications and milages as they presently exist in each municipality in the Brant Area.

Municipality	Roads Staff	Kings Highway	County	Suburban	Local	Total
Brantford Township	11 + 3 p.t.	30.81	11.60	37.73	117.17	197.31
Burford Twp.	6	18.93	39.28	8.50	150.73	217.44
S. Dumfries	4	22.99	24.40	9.00	75.85	132.24
Onondaga Twp.	2	11.50	9.65	-	40.99	62.14
Oakland Twp.		4.40	3.07	11.37	18.46	37.30
Town of Paris	6 + 2 p.t.	2.20	4.20	-	28.00	34.40
City of Brantford	68	-	-	-	178.00	178.00

TOTAL ROAD MILEAGE BRANT AREA

Highway	90.83
Local	581.20
County	92.20
Suburban	<u>66.60</u>
Total	830.83

The Provincial Highway system is intended to provide for the relatively long distance movement of goods and material between urban centres in Ontario. Since this road system is intended to serve all Ontario residents, it logically remains a provincial responsibility.

In the past the County Road System and the enigma known as the County Suburban Road System have functioned to provide and maintain the major traffic movement roads throughout the County. Although these roads are intended to provide for major traffic, they have at the same time attempted to provide a land service function and it is only in recent years that there have been tenuous steps taken toward controlling the land service function to protect the traffic carrying capacity of these roads.

Since the traffic roads provide for the major movement of goods and people throughout the entire area regardless of municipal limits, the logic of these roads being constructed and maintained by all seems irrefutable. On the other hand, roads which serve primarily a land service function should remain the responsibility of those who directly benefit.

The Commission recommends:

1. That a network of major roads to serve the entire County (including the City of Brantford) should become the new Brant County Road System.
2. That the recently completed Brant County Roads Needs Study and City of Brantford Transportation Study be used as basic resource material in the determination of which roads should be included in the Brant County Road System.
3. That the Brant County Suburban Road Commission be abolished and that the present Suburban Roads become part of the Brant County Road System.
4. That no change be made in the status of the present Provincial Highways serving the Brant area.
5. That all roads other than Provincial Highways and those roads making up the new Brant County Road System be considered as local roads and remain the responsibility of the municipality in which they lie.
6. That legislation provide the County with the power to control land uses adjacent to the Brant County Road System and power to control future access to this system.
7. That when the expanded County Road organization is being formulated, consideration be given to having that organization provide engineering, construction and maintenance service upon request to the local municipalities on a contractual basis.
8. That the Provincial grants for the new Brant County Road System be provided on the same basis as grants have been provided for regional roads in a number of recently created Regional Municipalities.

Chapter Eight

HEALTH, SOCIAL SERVICES AND HOMES FOR THE AGED

Resource Material Bulletin No. 10 (Social Services) and Resource Material Bulletin No. 11 (Health Services) provide a summary of Health and Welfare Services as they are presently provided to Brant Area Residents.

Social Services are now provided on a joint City-County basis under the Brant County Social Services Agency. The Children's Aid Society of Brant also serves the City, the County and the Six Nations' Indian Reserve. A Community Welfare Council serving the City and County has been in existence since 1953.

A review of the organizational chart for the Brant County Health Unit (see Table 1) indicates not only the very comprehensive range of health services provided but also indicates the extent to which the Health Unit is involved in the County.

During interviews and discussions with the professional people in both the Health and Social Services fields, the point was frequently made that health and social services cannot be separated. The

problems of overlap on one hand and fragmentation on the other raised the suggestion on numerous occasions that consideration should be given to the amalgamation of these essential and inter-related services.

Perhaps the most notable features of the present Health and Social Service delivery in the Brant Area are first, the very comprehensive nature of the services provided, the high standards being maintained in both the health and social services fields, and the fact that these services are presently provided on a joint County-City basis. Although a great deal would appear possible in the programme and studies presently underway to make more effective use of existing facilities and organizations through closer co-ordination of effort, there would appear to be minor difficulty in incorporating the existing Health and Social Service organization into the revised County structure recommended in this Report.

The Commission recommends:

1. That the provision of Health and Social Services be the responsibility of the proposed restructured County of Brant.
2. That the studies presently underway considering the possibility of much closer coordination of Health and Social Services continue and that serious consideration be given to associating these two inter-related services at the county level under one Director of Health and Social Services.

HOMES FOR THE AGED

The John Noble Home for the Aged, established by Provincial legislation in 1954 is managed by a Board of six Governors, consisting of three elected officials from the City of Brantford and three elected officials from the County of Brant.

Half of the capital building costs were provided by the Province of Ontario. The City of Brantford paid 75% of the second half and the County of Brant 25%.

In 1972, over 97% of the approximate \$1,400,000.00 operating costs of the Home was met through a combination

of residents' payments and subsidies from senior levels of government. The remaining 3% was met by the City and the County.

Since the restructured County Council as recommended in this Report will be made up of elected representatives from the County and the City, the Commission recommends that the operation of the John Noble Home for the Aged becomes the responsibility of the County of Brant and that the Board of Governors consist of a six man committee of County Council.

BRANT COUNTY HEALTH UNIT ORGANIZATIONAL CHART

Table 1

Medical Officer of Health	
<ol style="list-style-type: none"> 1. Administrator of Health Unit and Staff. 2. Responsible for maintenance of Public Health in Brant County. 	
<p><u>Nursing - Director</u></p> <ol style="list-style-type: none"> 1. Prenatal classes for expectant mothers. 2. Home visits for all age groups regarding all aspects of health including mental health and communicable diseases. 3. School services; Conferences with teachers, first aid, vision testing, home visiting from the schools. 4. Inspection of nursing homes, nursery schools, infant and adult boarding homes as defined by legislation. 5. Toddlers Groups. 6. Poison control visits to homes. 7. Audio-Vision Team for vision and hearing in schools and at Brant County Health Unit. 8. Immunization Team - routine immunization in all schools and clinics. 	<p><u>Special Services</u></p> <ol style="list-style-type: none"> 1. Mental Health - liaison with all Mental Health or Psychiatric facilities in Brant County: Brantford General Hospital Hamilton Psychiatric Hospital Children's Psychiatric Research Institute, London St. Thomas Psychiatric Hospital, St. Thomas 2. Central registry: all immunization recorded. 3. Liaison - St. Joseph's Hospital. 4. Liaison with all community agencies. 5. Communicable Disease Program - V.D., T.B., Hepatitis, Salmonella, Rabies and Childhood Diseases. 6. Family Planning Clinic every Wednesday a.m. 7. Toddlers' Interest Groups - to help mothers of the pre-schoolers understand their children's physical and emotional development.
<p><u>Food Control and Sanitation - Director</u></p> <ol style="list-style-type: none"> 1. Bacteriological testing of water and pasteurized milk. 2. Inspection of food premises, restaurants, schools, nursing homes, lodging houses and catering services. 3. Inspection of barber shops and laundries. 4. Inspection and water sampling program for recreational facilities. 5. Septic tank inspections and approvals. 6. Complaints regarding food, sanitation and housing. 7. Rabies control where human contacts are exposed. 8. Investigation of communicable diseases. 9. Liaison with other related Local, Provincial and Federal Departments. 	<p><u>Dental - Director</u></p> <ol style="list-style-type: none"> 1. County-wide examination and education of children (public and separate schools) in central preventive procedures. 2. The use of topical and self-applied fluoride compounds. 3. Source of information on questions related to preventive dentistry. <p><u>Home Care Program - Nurse Administrator</u></p> <p>This program provides nursing care, physiotherapy, home making services and other ancillary services to selected patients who may be cared for at home. The patient must be referred by his family doctor and continue under his supervision.</p>

Chapter Nine

WATER SUPPLY AND SEWAGE DISPOSAL

Water supply and sewage disposal are considered jointly in this Report in that they are two parts of what is in reality a single system. Concentrated urban development can only take place where and to the extent that it is assured of a reliable source of water and an equally reliable method of treatment and disposal of this water after it has served the urban development.

Within the Brant Area a complete system of publicly owned and operated water supply and sewage disposal facility is provided by the two urban municipalities of Brantford and Paris. In the City of Brantford, municipal water supply is provided to all of the developed areas within the City from a plant having a capacity of 15 M.I.G/D. The Commission is informed that planned expansion will increase this capacity to 19 M.I.G/D.

The Town of Paris also provides municipal water to all of the developed areas within the municipality from system having a pumping capacity of 1.4 M.I.G/D. Approximately one-third of the developed areas in Brantford Township are provided with municipal water, while the Township

of South Dumfries provides a municipally operated water supply system in the Police Village of St. George.

The City of Brantford provides a sewage collection system to almost ninety five per cent of the developed areas within the City limits and this sewage is treated at a plant having a capacity of 12.5 M.I.G/D. Major extension to the existing sewerage collection system is planned and detailed in The Brantford Urban Growth Study.

In the Town of Paris the sewage collection system now serves approximately one-half of the developed area. The Paris treatment plants present capacity of 550,000 I.G/D. is planned for expansion to 650,000 I.G./D.

Consideration is being given to the provision of sewage collection and treatment facilities in the Township of Brantford and for the Police Village of St. George in South Dumfries Township.

The Planning section of this Report makes recommendations intended to respond to the many submissions that held that planning on a county or regional basis was the most urgent need in the Brant Area. In making these recom-

mendations, the Commission recognizes that planning is a meaningless exercise unless and until there is power to implement the approved plans.

Control of the supply of water and sewage treatment is held by many to be the key implementing tool in directing and guiding urban growth. It has therefore been argued that if planning is to become a county responsibility, the control of water supply and sewage treatment facilities must also rest at the county level to assure implementation of the approved plans.

This would appear to be the position adopted by provincial authorities both in the creation of regional governments in Ontario and with regard to possible restructuring of Counties.

The position has recently been restated by the Honourable John White in his speech to the Annual Convention of the Association of Counties and Regions of Ontario on Monday, October 29, 1973.

In this speech, Mr. White indicated that the Province of Ontario was prepared to react to requests for restructuring on a County basis and to provide such approved restructured Counties those grants now paid to regions.

To be eligible for these increased

grants, the Minister indicated that such restructured Counties should probably be required to provide at least seven services. These are:

- supplying water to the inhabitants of the county;
- collecting and treating sewage;
- operating an arterial system of roads;
- carrying out the planning function, including preparing, developing and implementing planning concepts for the county;
- providing health services within the county;
- maintaining a welfare program for the county;
- capital borrowing;

In addition to these seven functions, there is the question of police protection. As with the regions, an additional grant would be provided to a county operating its own police force.

The Commission has stated as a basic principle in preparing recommendations for restructuring local government, that the taxpayer should pay for only those services from which he directly benefits. In the matter of municipal water supply and sewage disposal, no direct benefit will accrue to the majority of the residents of the two rural municipalities (with the exception of those residents of the Police Village of St. George). In the opinion of the Commission, no part

of the cost for these services should therefore fall to the taxpayers in the rural municipalities who will not use the services.

The simplest and most straightforward method of relating costs to those who directly benefit would, of course, be to leave the responsibility of water supply and sewage disposal to the local municipalities. In this system, only the taxpayers directly benefiting become financially liable. Such a recommendation would have to assume that control of development and plan implementation could be effected at the County level through the provisions of the Official Plan (which this Report recommends be solely a County responsibility) and by means of the delegation to the County of the Provincial powers to approve rezoning applications, subdivision applications, land severance applications, and County control of capital borrowing.

In many ways, the Commission has found this the most difficult matter on which to make recommendation. Define its advantages can be seen for leaving the responsibility for water supply and sewage disposal to those local municipalities who require these services. On the other hand, the importance of these key

services in directing and controlling growth suggests strongly that these services should become a responsibility of the County. On balance, the Commission must conclude that a water supply and sewage disposal system is so basic to the future growth and development of the Brant Area that it must become a County responsibility.

The Commission recommends:

1. That water supply and sewage disposal become the responsibility of the restructured County.
2. That water distribution and sewage collection remain the responsibility of the local municipality.
3. That the costs of water supply and sewage disposal facilities be assessed entirely against those taxpayers who directly benefit by receiving these services.

SOLID WASTE COLLECTION AND DISPOSAL

Details of the present solid waste collection and disposal facilities and costs for all Brant Area municipalities is provided in Resource Material Bulletin No. 12. Under the existing system, garbage collection and disposal is the responsibility of each local municipality in Brant County.

At present, collection services are provided by private contract to all residents in four of the seven local municipalities. These include the City of Brantford,

the Town of Paris and the Townships of Burford and Oakland. Private collection is provided to approximately 80% and 98% of the residents in the Townships of Brantford and Onondaga respectively, and to the residents of St. George only in the Township of South Dumfries.

There are presently three landfill sites in the County (Paris, the City of Brantford, and the Township of Brantford) and three dump sites for non-putrescible wastes (City of Brantford, Townships of Oakland and Burford).

In the matter of collection of solid wastes, each municipality has made arrangements through private contractors to provide a collection system which appears to provide satisfactory service to the residents. Little, if any, criticism of the present system of collection was received by the Commission.

A variety of methods of charging for this service is presently in effect and rates vary from municipality to municipality reflecting not only the varying standards of service provided but also the differing situations encountered, particularly with regard to the amount and frequency of industrial and commercial pick-up, the distance between pick-ups, etc.

It is the opinion of the Commission that the present system of collection of solid wastes reflects the needs of the citizens of the individual municipality and that the responsibility for collection of solid waste should remain with the local municipality.

In the matter of disposal of solid wastes, a fairly complex system of inter-municipal agreements exists both within the Brant Area and with municipalities beyond the County. The main sites presently in use include a 180 acre site in the City of Brantford known as the Mohawk Road site which receives solid wastes, not only from the City, but also by agreement for part of the collection from the Township of Brantford and from the Township of Onondaga.

The Town of Paris also operates a 63 acre solid waste disposal site in a former gravel pit area. This site also receives solid waste collected in the area of the Police Village of St. George in South Dumfries Township. It is understood that the Town of Paris is presently considering the acquisition of additional garbage disposal sites.

In addition to utilizing the City of Brantford site, the Township of Brantford also utilizes a 50 acre site within the

Township.

Solid wastes collected in Burford and Oakland Township are disposed of at a site in North Norwich Township in Oxford County.

The continually increased volumes of solid wastes, the difficulties in obtaining satisfactory disposal sites, and the greatly increased operating costs, have combined to 'elevate' the disposal of solid waste to a position of major concern in all developing areas. Consideration of new sites relates to a combination of factors including land use, pollution considerations, public reaction, hauling costs, as well as operating costs.

As is apparent from the present operations, satisfactory disposal sites cannot necessarily be related to municipal limits. The provision and proper operation of additional sites will demand careful and long range planning and land use considerations in the choice and development of sites to serve an area population.

The Commission recommends:

1. That the County be responsible for the operation of solid waste disposal site and the planning and acquisition of future sites.
2. That the local municipalities retain the responsibility for the collection of solid wastes and delivery to the disposal site.

Chapter Ten

FINANCE

Resource Material Bulletin No. 4, entitled "Existing Municipal Operations", provides a detailed breakdown of Revenue and Expenditures for each municipality in the Brant Area together with many other details of the existing municipal operations of Brant Area municipalities.

The very wide variation in sources from which direct taxation is derived is very apparent from an examination of these Tables. In 1971, thirty-eight per cent of the total taxes paid in the City of Brantford came from commercial, industrial and business assessment. On the other extreme, only two per cent of the total taxes in Onondaga Township came from these sources.

Similar variations are very apparent in the percentage of the total municipal revenues which are received from the provincial and federal governments. Nearly twenty-nine per cent of the total revenue of the Township of Burford came from these sources while the City of Brantford received less than seventeen per cent of its total revenue in 1971 from federal and provincial government sources.

Wide variations can also be noted in

the breakdown of expenditures of the various municipalities. This, of course, must be expected when comparisons are attempted between urban municipalities which provide a full range of urban services to urban development and rural municipalities providing those services required to serve a rural economy.

An examination of these statements of expenditures provides, in the opinion of the Commission, clear indication of the very different standards of service which characterize major urban and predominantly rural municipalities. Each of these municipalities has a similar responsibility - to provide the citizens with the services he requires - but the required service standards necessarily vary tremendously.

ASSESSMENT BASE

The 1971 Municipal Financial Reports Data (Volume 2C) published by the Ministry of Treasury, Economics and Intergovernmental Affairs includes financial data for the Counties of Brant, Haldimand, Norfolk, Oxford and Perth. A comparison of the Equalized Taxable Assessment reported for these Counties gives an in-

dication of the strong assessment base in the Brant Area.

<u>County</u>	<u>Equalized Taxable Assessment</u>
Brant	\$ 681,014,000.00
Haldimand	\$ 260,493,000.00
Norfolk	\$ 528,012,000.00
Oxford	\$ 636,836,000.00
Perth	\$ 449,048,000.00

The combined total taxable assessment of Brant - Brantford as of September 1972 was reported by the Brant, Norfolk, Haldimand Assessment Office to exceed two hundred and two million, five hundred thousand dollars. Applying the provincial equalization factors, this would represent an equalized assessment exceeding six hundred and ninety-three million dollars.

This relatively large assessment would appear to provide a strong base for the continued growth and development of the Brant Area and certainly would not seem to support the contention of some of those making submissions that Brant was 'too small' on its own to properly meet the responsibilities incumbent on local government.

It is the opinion of the Commission that the problems of the present operations of local government in the Brant

area relates less to an inadequate financial base than to the fragmentation of this base in too many local government jurisdictions. This fragmentation has not only tended to dissipate the over all strength of the area but has created unnecessary and undesirable inter-municipal conflicts.

The regrouping of municipalities as recommended in this Report into fewer and stronger units of local government and the reorganization of duties and responsibilities should go far toward eliminating both of these problems.

GRANTS AND SUBSIDIES

The Commission recommends that legislation provide that the restructured County of Brant be eligible for those additional provincial grants which are presently provided to Regional Municipalities pursuant to the provisions of the Regional Municipal Grants Act R.S.O. 1970 as amended.

The recommended alteration in grant structure may well provide increased grants to the Brant Area municipalities in excess of a million dollars annually.

In addition to the regional municipal grants recommended above, it is further

recommended that provision be made in enabling legislation for the provision of additional transitional grants to assist the Brant Area in the reorganization of municipalities, duties and functions, as recommended in this Report.

CAPITAL BORROWING

It is recommended that all capital borrowing and the issue of debentures for the purposes of the County and/or any local municipality or municipalities within the County be the responsibility of the County of Brant and that legislation provide that debentures for County purposes or for the purpose of any local municipality within the County may be issued on the credit of the County of Brant.

Chapter Eleven

JOINT BOARDS AND COMMISSIONS

Resource Material Bulletin No. 5 provides a summary of the make-up, operation and financing of many of the joint boards and commissions presently operating in the Brant Area.

Perhaps the most significant feature of the present operation of joint boards and commissions is the degree of cooperative effort between City and County in jointly meeting Area wide needs particularly in the fields of health, welfare, hospital and social services.

The Commission in this Report has recommended the abolition of some of the existing joint boards and commissions (Brant and Suburban Road Commission, The Brant Planning Board, etc.); the transfer of responsibility in some areas directly to the restructured County (Health, Welfare, Social Services, Hospitals, etc.), and foresees that many of the remaining joint Board and Commissions might advantageously become part of the restructured County organization in future.

Because of the complexity of the legislation which established many of these joint organizations, and of the very

specific nature of the methods whereby appointments are to be made to the various boards and commissions, the Commission does not feel competent to make specific recommendations relative to their possible reorganization within the restructured County.

The Commission does recommend as a principle that thorough consideration be given by the proposed restructured County Council as to how these various organizations might best be integrated into the County structure.

It is further recommended that the suggested studies should include consideration of the fact that the joint boards and commissions managed budgets well in excess of eighteen million dollars in 1971. In very few cases was the management of these monies under direct control of the elected representatives. The Commission - like the municipalities - appreciates the tremendous contributions made by citizens who give so freely of their time and ability to serve on appointed boards and commissions. On the other hand, it is the elected official who is charged with the responsibility of the operation and financing of those services required by

the electors.

In the continuing review and restructuring of boards and commissions within the revised County structure recommended, elected officials must be prepared to assume more direct responsibility for the operation and financial control of many of the services presently operated by appointed boards and commissions.

PARKS AND RECREATION

Resource Material Bulletin No. 4 entitled 'Existing Municipal Operations', provides details regarding some sixty-seven municipally owned park and recreation facilities in the City of Brantford; seven municipally owned facilities in the Town of Paris, and some seventeen municipally owned park and recreation facilities provided by Brant County Townships. An additional twenty facilities within the City and County are listed which are not municipally owned.

In addition to the foregoing are the increasing amounts of land being acquired by the Grand River Conservation Authority, much of which is being made available to the public for passive recreation purposes.

The Commission finds that developed parkland in the City of Brantford presently

meets the generally accepted desirable ratio of ten acres per thousand population and that additional acreages of undeveloped park and open space is available to the residents in the immediate vicinity.

The recreation programmes provided in the urban centres received no unfavourable comment although some concern was expressed that people from one municipality were making use of recreation facilities provided by another. Neither those who made this comment, nor the Commission, feel a serious concern in this regard. The residents of all municipalities derive benefit from their ability to enjoy the park and recreation facilities throughout the entire area.

The Commission recommends that the provision of park and recreation facilities remain the responsibility of the local municipality but this is not to suggest that the County of Brant should not enter into 'Schemes' with the Conservation Authority for the acquisition of major recreation and conservation areas to serve the residents of the entire Brant Area.

INSPECTION SERVICES

Resource Material Bulletin Number 9 provides a detailed description of in-

spection services as they are presently carried out in the Brant Area. As can be seen from this Report, the standard of inspection services varies from full time Inspection Department employing a six man staff in the City of Brantford, to a part time Building Inspector in the Township of Burford. This Township does not provide plumbing inspection or fire inspection.

A staff of one provides building, plumbing and fire inspection in the Township of Brantford. The Town of Paris, the Township of Oakland, the Township of Onondaga and the Township of South Dumfries are all served by one inspector who is employed by the County to carry out building, plumbing, trench and construction safety inspections in these four municipalities.

It has been the experience of the Commission that in the matter of adequate control and safety measures, problems appear to arise less because of inadequate legislation than because of inadequate inspection and enforcement. These inadequacies are not due to any lack of desire on behalf of the municipality to carry out inspection and enforcement of local by-laws, but rather it is impractical for these municipalities to maintain

adequate qualified staff for this purpose.

In all cases, legislation is only as good as its enforcement and the mere passing of regulatory by-laws by a Council serves no purpose unless and until the regulations are enforced. Inspection services are carried out primarily to provide protection to the residents of the municipality. To assure that the residents are properly protected, sufficient qualified staff must be available.

The Commission recommends:

That the County of Brant be responsible for the provision of comprehensive inspection services for all Brant Area municipalities.

CONSERVATION

One of the principle reasons submitted in support of a joint Brant-Haldimand-Norfolk Region was the common interest these municipalities shared in the Grand River. While at one time this river served as an important means for the movement of goods and people, it no longer plays a significant role in this regard. None the less, the importance of this River to all of the municipalities in the valley is as great now as at any time.

The Grand River provides a source

of water for municipal water supply systems. The River serves to receive the effluent from sewage treatment plants in all of the urban centres throughout the Grand Valley. In the future, this River may make its greatest contribution as a major recreation facility for the hundreds of thousands of urban dwellers within and adjacent to the Grand River Valley.

Although the Commission recognizes the advantages which might accrue if the lower section of the Grand falls within the jurisdiction of a single Regional Government, it also feels that this argument is much weakened when it is recognized that the condition of the lower Grand is dependent to a very large extent on actions taken or not taken on the upper section of the River.

The Commission specifically requested the Grand River Conservation Authority to appear at the public hearings to discuss the Authority's role in the management of this major resource. The Chairman of the Authority, Mr. James Bauer, together with a number of Members and staff members from the Authority, responded to the Commission's request.

It was the impression of the Commission that although the Authority saw some merit in dealing with fewer and

larger municipalities, that this did not seem to be a key consideration in the continued success of the Authority's operations.

The whole area of conservation of resources is a matter of increasing concern to all people. As this concern relates to the Grand River Watershed, the Commission is convinced that the co-ordinated and increasingly comprehensive programmes undertaken in the entire watershed through the Conservation Authority will best serve the people of the valley generally and the people of the Brant Area specifically.

In order to further strengthen and consolidate the representation on the Conservation Authority from the Brant Area, the Commission recommends that the County of Brant assume responsibility of representing all Brant residents and municipalities on the Grand River Conservation Authority.

THE SIX NATIONS

Although it is recognized that the Six Nations Indians do not form part of Brant County for local government purposes, none the less they make use of some of the facilities provided by or through the local government structures surrounding them.

The Commission was informed that the use of these facilities is paid for by the Six Nations on a use basis, but that in some cases difficulties are encountered by local governments in the matter of capital costs to provide these facilities.

The Commission does not feel that either its competence or its terms of reference permit any comment with regard to the Six Nations other than to note that

there are areas of concern which have been expressed and to suggest that the Province review the relationship between local government in the Brant Area and the Six Nations with a view to attempting to alleviate any problems which may exist for either the Six Nations' people or the local government structure in the Brant Area.



3 1761 11546219 4